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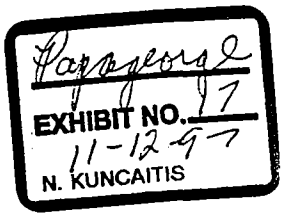

December 20, 1976

Dr. Jerry M. Johnson
Acting Chief,
Criteria Documentation, Section 1
NIOSH, DCD6D, RM 142
4676 Columbia Parkway
Cincinnati, Ohio 45226

Dear Dr. Johnson:

At the review meeting held on November 30 on the draft criteria document for polychlorinated biphenyls I was left with the impression that future drafts of the document would continue to contain allegations that PCBs are human carcinogens and that they should be labeled as "cancer suspect agents".

In previous opportunities to comment I have emphasized the lack of persuasive evidence to provide a sound basis for designating PCBs as carcinogens. At the review meeting Dr. Paul E. Brubaker reported that the cohort in the ongoing Mobil Epidemiological Study has been reidentified and changed and that the results are now expected to differ from those initially reported. The reports, from Industrial Biotest Laboratories and the Appley Institute, which I gave to Mr. John Fajen, contain conclusions which differ from those reached by Dr. Renate Kimbrough in her studies with female rats.

It is our considered opinion that this information further emphasizes the uncertainty of some of the available data and we strongly recommend that your office reconsider its decision to continue to designate PCBs as cancer suspect agents.

Sincerely,

ORIGINAL SIGNED BY
W. B. PAPAGEORGE

W. B. Papageorge
Manager,
Product Acceptability

ja

cc: Mr. John Fajen - NIOSH

bcc: R. A. Stohr/J. C. Weber

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