

WORKERS health

To the Editor:

PI-4/5/2
I would like to take this opportunity to commend The Inquirer and in particular, staff writer Susan Q. Stranahan for the five-part series concerning the Occupational Safety and Health Act of 1970.

My organization was very active in the ultimate enactment of this law and is currently doing its best to have Congress provide the necessary funds so that its intent can be properly carried out.

I have read a lot of material on this law but nothing has been better than Ms. Stranahan's articles. She must have put literally untold hours, days and months into her preparation.

It was an excellent job for which we are very grateful.

JULIUS UEHLEIN
Secretary-Treasurer
Legislative Committee
of Pennsylvania

Harrisburg.

The Society of the
Plastics Industry, Inc.

355 Lexington Avenue
New York, New York 10017
(212) 573 9400

March 30, 1976

The Editor
The Philadelphia Inquirer
400 N. Broad Street
Philadelphia, Pa. 19101

Dear Sir:

The article on occupational health by Susan Q. Stranahan from the March 21 issue of the Inquirer contains a significant number of errors and distortions, especially with regard to the vinyl chloride situation.

The article's assertion that no research efforts were undertaken by the American PVC industry is totally incorrect. Beginning in early 1973, an extensive animal inhalation study was launched at Industrial Bio-Test Laboratories in Illinois, and a survey of present and past PVC workers was started by Tabershaw-Cooper Associates of Berkeley, California. These studies were both announced publicly, and their results released to the American people in 1974. In fact, it was the American industry sponsored animal study, and not that of Dr. Maltoni in Italy, that first produced angiosarcomas in test animals at 50 ppm.

The totally fallacious issue of what research was undertaken at what time, and who knew about it, and who he told and who has been rehashed in the press for more than two years. The essential facts are, nonetheless, quite simple.

It was the PVC industry -- and not the government, or labor unions, or the so-called "independent" medical community -- that initiated and sponsored essentially all of the medical research on vinyl chloride before 1974, including that of Drs. Viola and Maltoni in Europe. And it was a member of the industry who made the first tenuous connection between VC exposure and angiosarcoma in humans. In fact, were it not for the actions taken by industry from 1970 onward, we might still today know next to nothing about the health effects of vinyl chloride inhalation.

RECEIVED

APR 14 1976

G. D. LLOYD

RECEIVED

APR 6 - 1976

R. A. PARK
RECEIVED

MAY 21 1976

RECEIVED
C. J. KILINERT
MAY 14 1976

R. W. ARNOLD

RECEIVED

JUN 14 1976

F. S. BRY

RECEIVED

APR 23 1976

C. E. KILBENBER

RECEIVED

APR 13 1976

J. L. RUSS

MAY 4

RECEIVED

APR 20 1976

J. M. HASKELL

RECEIVED

APR 12 1976

J. J. TAYLOR

continued...

RECEIVED

MAY 19 1976

PILOT PLANT

OCC 0685

While there are obviously still disagreements over the precise information relayed at the meeting between the industry and NIOSH in July, 1973, the fact remains that it was the industry which requested the meeting because it felt an obligation to keep the government informed of developments in the research area.

It might appear in hindsight that both the industry and government failed to appreciate the significance of the early research findings, and that subsequent studies were undertaken at a somewhat leisurely pace. It cannot be emphasized too strongly, however, that at the time there was no established link between exposure to vinyl chloride and cancer in humans. The industry sponsored worker studies were undertaken to determine if such a link existed, but events proceeded faster than the research.

The article is totally incorrect with regard to certain basic facts concerning the OSHA hearings in 1974. The standard proposed by OSHA was not 1 ppm, it was very specifically "no detectable level." The industry testified then, and it still believes today, that such a standard would be technologically infeasible. Obviously, OSHA agreed because it changed the standard to 1 ppm, and added a peak exposure value of 5 ppm for any 15 minute period.

These and other significant changes in the original OSHA proposal, plus the rapid development of revolutionary new control devices, permitted the industry to continue in operation. Furthermore, the estimated \$300 million cost for compliance with the standards breaks down into \$50,000 for each of the approximately 6,000 employees in the VCM and PVC resin industry, a not insubstantial commitment to worker health.

With regard to the general public, your reporter is obviously unaware of a recent extensive study undertaken by the Environmental Protection Agency which concluded that there is "no evidence that living around vinyl chloride plants is a risk factor in the occurrence of liver angiosarcoma."

There are numerous other errors, both large and small, in the article, e.g. the OSHA standard went into effect April 1, 1974, not 1973; the American industry did not co-sponsor Dr. Maltoni's research, it undertook its own instead; the original OSHA standard of 500 ppm was an ACGIH standard, not one developed by the Manufacturing Chemists Association; the 1949

continued

OCC 0686

The Philadelphia Inquirer

Page 3

Russian study identified PCB exposure, not vinyl chloride, as the cause of hepatitis, etc.

The essential question in the vinyl chloride experience, and the only one worthy of the nation's attention, is whether any segment of the American public is currently in danger from exposure to excessive amounts of vinyl chloride. It is our firm conviction, based on all the available evidence, that the threat to the American people, whatever it might have been in the past, has been eliminated. Over a period of two years plant exposure levels have been reduced a hundredfold or more and the same is largely true of emissions into the environment.

Never before in occupational health history has an industry labored so arduously, rapidly and successfully to eliminate a recognized hazard -- one which the industry itself discovered. This is the record on which we feel we deserve to be judged.

Very truly yours,

Ralph L. Harding, Jr.
President

RLH/IS

bcc/ Russell A. Park ✓

OCC 0687