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Frank J. Ryan
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Dr. Bruce W. Karrh
E. I. DuPont de Nemours & Co., Inc.
1007 Market St.
Wilmington, Delaware 19898

Dear Bruce:

I looked forward to participating in the American Industrial Health Council's (AIHC) February Planning Session and Board meeting. However, my travel associated with our recent European chemical company acquisitions and assignment as a key participator in Air Products' World Management Conference on growth precludes me from attending the AIHC meetings. However, I am forwarding to you Air Products' position on the questions that will be addressed at the AIHC Planning Session. I hope these comments will be useful to you in your AIHC leadership role.

The questions we addressed are:

- What is Air Products' impression of AIHC?
- What does Air Products see as AIHC's most beneficial role to serve Air Products and its member companies?

Air Products' Impression of AIHC

As you know, "the mission of the American Industrial Health Council is to advocate and promote the implementation of the most advanced sound scientific methods as a basis for the review, risk assessment, regulation, where regulation is warranted, of the substances which may pose significant chronic health risks to people without acting as an advocate for any specific substances".

Our consensus is that Air Products' membership and contributions to AIHC are beneficial to our business. AIHC should continue to pursue its mission.

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The following are some of our impressions of AIHC:

- AIHC is the only trade association that has any credibility on scientific health issues with the regulatory agencies such as NIOSH, EPA and FDA. Its expertise is well recognized in risk assessments. It has excellent contacts in the agencies, academia and member companies. It is on the leading edge of testing in toxic matters. It has convinced EPA to change its position on the use of automatic triggers for carcinogenicity testing under the Toxic Substance Control Act (TSCA). AIHC's weight-of-the-evidence risk assessment position is widely accepted in the upper echelons of the agencies.
- AIHC is very credible and effective in scientist to scientist communications in government and the public. The scientific personnel participating at the AIHC meetings and task forces are highly respected.
- Air Products' personnel value these contacts and the information provided by AIHC. Our participation has saved us considerable resources in dealing with industry-wide issues that we face in our business.
- Air Products does not have a toxicology lab or the personnel resources as do some of the large organizations that participate in AIHC. However, we do have access to their ideas, information and personnel through the AIHC. AIHC is on the right track and they are working on the large chronic health issues. They have advanced the cause of good science in a credible non-political manner. AIHC is a good idea and holds the regulators accountable to good science. While we don't often see the direct benefits on day-to-day activities in the plants, we support our resource and sweat equity commitments to AIHC.

In summation, Air Products considers our AIHC participation mutually beneficial and a valuable resource for us. AIHC is the only organization of its nature. The demand on its services and value to Air Products and the industry will continue to grow because of increasing national sensitivities to the toxic effects of chemicals in the environment.

AIHC Growth and Direction

In addressing AIHC's future growth and direction relative to the needs of its member companies and the chemical industry, Air Products offers the following comments for AIHC's consideration:

AIHC communicates effectively and credibly scientist to scientists, but improvements could be made in communicating on health issues with non-scientific thought leaders in the academic, government, public, business and media sectors.

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The lack of understanding of causes of chemical health effects, risk assessments, comparative risks and benefits by these sectors could be largely contributing to the wider acceptance of emotionally motivated "zero risk" type legislation and regulation that is detrimental to the growth of the chemical industry in America.

Perhaps AIHC could prepare a pamphlet with the basics of toxicology, risk assessments and comparative risks in the language that is understandable by the non-scientific sectors. A communications expert could be engaged to convert the scientific concepts into understandable layman terms with convincing impact. AIHC should develop a "set of tools" that market valid scientific concepts in their usual balanced "good science" manner on health effects to the layman as well as the scientist.

AIHC is the only trade association of its type that has scientific expertise on chronic health issues. Because of the proliferation of legislation and regulation addressing health concerns from chemical exposure, most of the trade associations are reacting to the demands of their membership and are also taking part in "toxics" issues. AIHC could serve as other trade associations' intellectual scientific backup on "toxics" issues, e.g., on worker notification, SARA Title III and Proposition 65, etc. type issues.

The role of AIHC, vis-a-vis, CIIT and CMA is a subject that has received some deliberation. While each serves a different purpose, their effectiveness could be improved by continued tighter coordination on common issues. Many of the same member companies support these three entities. AIHC may wish to rethink its relationship with CIIT and consider merging into a possibly more effective larger organization. CIIT develops basic health science and AIHC excels in communicating chronic health effects issues with the appropriate sectors. Each organization could concentrate in their area of excellence, perhaps more effectively as a merged organization in meeting common objectives.

The pharmaceuticals industry has developed advanced technology in health effects of substances. AIHC may wish to evaluate, better understand, and where applicable, utilize this technology in pursuit of its mission.

Issues on reproductive effects of chemicals is rapidly becoming a serious problem to the industry. While AIHC is working on this area, the public is very emotional on this issue, particularly in our manufacturing locations in Louisiana, Kentucky and California. Proposition 65-type legislation is a zero risk example of the public's perception of chemical exposure health effects. AIHC should increase and continue its efforts in education of reproductive toxicology, neurotoxicity, carcinogenicity and biomonitoring. Perhaps, a better understanding of the health effects associated with chemicals could produce logical sound legislation and regulation rather than emotional zero risk outcomes.

AIHC is working on improving risk assessment models. However, there are concerns that biological validity of most of the models are in question as predictive of human health effects of chemicals. AIHC may wish to promote other more biologically valid risk assessments.

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Dr. Bruce W. Karrh

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AIHC continues to broaden its educational campaign and outreach on chronic health issues. Towards this end, AIHC may wish to consider dialogue and projects with the more reasonable environmental groups to further prevent the politicization of scientific health issues. AIHC may also wish to use the large communication networks of BRT, NAM and the U.S. Chamber to educate a larger audience on key issues.

AIHC should consider structuring and promoting a conceptual framework for research programs to be conducted by CIIT, government, industry and academia leading to the goal of short-term predictive tests to replace "automatic" carcinogenicity tests.

I hope these comments will be useful to you and the Board at the Planning Session. I regret that my schedule does not permit me to attend these sessions. However, if you wish more information concerning these comments, please call me at 215-481-6890 or Tony Diglio at 215-481-8339. I'm looking forward to seeing you again and participating with the AIHC.

Regards.

Sincerely yours,

cc: R. A. Lang - AIHC

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