



MANUFACTURING CHEMISTS ASSOCIATION

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February 15, 1974

To the Management Contacts of Companies Sponsoring
the Vinyl Chloride Research Program
and the
Technical Task Group on Vinyl Chloride Research

Subject: February 15, 1974 Hearings
Occupational Safety and
Health Administration

Gentlemen:

Herewith for your information is a copy of the Manufacturing Chemists Association statement (without attachments) submitted at subject hearings. If any attachments are of special interest to you, please do not hesitate to get in touch with us and we will try to provide any except the reprint (A) on the List of Attachments.

Sincerely,

A.C. Clark

ACC:tp

Enclosure

cc: Dr. D. P. Duffield
Mr. D. M. Elliott
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ASI 000017008

Many Workers Still Face Health Peril Despite Law

By JANE E. BRODY

The recent discovery of fatal liver cancer among vinyl chloride workers has focused renewed attention of government, labor, industry and medicine on the thousands of known, suspected and as yet unsuspected health hazards that face 60 million working Americans.

Despite the passage three years ago of the Occupational Safety and Health Act, granting every American the right to work without job-induced threats to life and health, the overwhelming majority of workers are not yet protected by the law's provisions. For lack of this protection, hundreds of workers are dying

each day from occupational diseases.

The Government Accounting Office acknowledges that there has not been nearly enough money and staff allocated to make a dent in the vast problem of occupational health. In addition, fundamental scientific knowledge is lacking upon which to base remedial actions, and without more funds the necessary research is not forthcoming.

Historically, occupational health has been a low-priority item for both government and medicine.

Yet, each year one of every

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10 workers suffers a job-related illness or injury. The Public Health Service estimates that prolonged on-the-job exposure to toxic chemicals, dusts, noise, heat, cold, radiation and other industrial conditions each year results in the death of at least 100,000 workers and the development of disabling occupational diseases in 390,000 more.

Researchers in occupational health believe that countless thousands of others succumb to insidious job-related diseases not yet discovered by science.

Industry sources estimate that only between 5 and 15 per cent of workers are covered by comprehensive company medical departments, which have the potential for detecting work-related health threats.

Inadequate Standards

Enforceable Federal standards to protect worker health currently exist for only 450 of the estimated 15,000 chemical and physical agents to which workers are exposed, and experts in occupational health say that most of these standards are inadequate and unenforced.

For vinyl chloride, for example, the existing Federal standard is 10 times higher than what most industrial users themselves adopted years ago, and is infinitely higher than the zero exposure level that labor and university scientists recommend.

THE NEW YORK TIMES

March 4, 1974

New standards developed under the Federal law are being promulgated by the Department of Labor's Occupational Safety and Health Administration (O.S.H.A.) at a rate of only one a year. At the same time, industry is introducing some 400 new chemicals each year, nearly all of which are untested for possible long-term effects on the workers who handle them.

There is virtually no testing of combinations of substances; that by themselves may be harmless but become deadly when combined, although a leading occupational hazard—*asbestos*—is known to greatly increase the risk of lung cancer only in workers who smoke cigarettes.

"The long-term effects of the vast majority of chemical and physical agents used in industry have not been proved, and practically no research is being conducted to find out what these effects are," Dr. Jeanne M. Stillman and Dr. Susan M. Daum state in their new book, "Work Is Dangerous to Your Health."

But Dr. Irving J. Selikoff, director of environmental sciences at Mount Sinai School of Medicine, said, "For scientists to worry about what we don't yet know when nothing is being done about what we already know is a cop-out." He noted that even if there were enough data to develop protective standards for all known and potential dangers, the Labor Department would be hard put to enforce them with only 600 Federal inspectors and hygienists to canvass nearly five million workplaces.

During its first eight months, O.S.H.A. inspectors visited 17,743 workplaces. At this rate, it would take them more than 200 years to visit each one once. If the staff were expanded to the original projection of 2,000, it would still take about 50 years to complete the rounds of workplaces.

In thousands of plants throughout the country, workers do not even know what chemicals they work with since, to protect trade secrets, the substances are given only code numbers. And unless a Federal standard exists, the company is not required to monitor worker exposure to

periodic medical examinations of those exposed.

"The act has done a great deal to improve the worker's perceptions about the situation, but it hasn't yet done much to improve the situation," said Anthony Mazzocchi, legislative director of the Oil, Chemical and Atomic Workers International Union.

Franklin Wallick of the United Automobile Workers, who wrote a book called, "The American Worker: An Endangered Species," said that for the most part workers are still "the human guinea pigs for industrial processes."

In interviews last week, labor, industry, government and university sources agreed that although the occupational health law was a giant and essential step in the right direction, the realities of current Administration funding have deprived it of much-needed muscle.

Under the act, the National

Institute for Occupational Safety and Health (N.I.O.S.H.) was set up to survey industrial health problems, conduct needed research and develop new standards for known and potential occupational hazards.

But in the wide bureaucracy of the Department of Health, Education and Welfare, the institute has thus far been treated like an unwanted stepchild.

According to a recent analysis by the Government Accounting Office, a meager budget of about \$24-million and a staff limited in size (600) and professional level have severely hampered the institute's potential accomplishments.

As a result, in its first two and a half years, the institute has been able to develop the criteria for only 16 new standards for hazardous materials, although the institute's list of high priority agents exceeds 400.

To handle "emergencies" like vinyl chloride, the institute has been forced to divert funds and personnel from other essential but less immediate tasks, such as developing standards that might head off other vinyl chlorides before workers succumb to their effects.

Last year, the ordinarily sedate and sober director of the institute, Dr. Marcus Key, exploded with exasperation:

"N.I.O.S.H. is not expanding, it is shrinking. It is getting the proverbial meat ax. . . . Our present laboratory space isn't even adequate for any kind of research. It is substandard. . . . We have been frozen on hirings for most of our existence, and we are losing key staff right and left because we don't have the grade points to promote them. . . . I don't think N.I.O.S.H. is a viable organization at this time."

In an interview last week,

Dr. Key said the situation had not yet improved. "If anything, it's worse," he remarked.

The institute's efforts are not aided by the fact that occupational health has been virtually ignored by the medical profession, which regards it as a less-than-glamorous specialty. Only a handful of universities have departments of occupational health and fewer than a dozen physicians enter the field each year, the majority becoming company doctors.

The institute also faces the scientific problem of how to determine when a substance is safe. As Dr. E. Cuyler Hammond of the American Cancer Society said:

"Negative results in testing a substance for cancer-producing properties are meaningless, and a clever-enough researcher can make almost anything induce cancer in animals, but his findings may have no

relevance to human exposure." Rather than recommending "safe" exposure levels, Dr. Hammond and Dr. Key believe that industry should adopt protective work practices that eliminate worker exposure to all agents—whether or not they have been proved harmful.

Such work practices were recommended by the institute for 14 cancer-causing industrial chemicals covered by an emergency standard issued last spring. The institute advocates a similar approach to vinyl chloride, a gaseous chemical in the plastics industry that in the last month has been linked to angiosarcoma of the liver, an extremely rare cancer, in nine workers at four different plants.

A further problem in gaining worker protection under the act has been the slowness of the Labor Department in issuing new exposure standards and its reluctance to assume full enforcement responsibility.

Thus far, the Institute has acted on only two of the institute's 16 proposed standards—*asbestos* and *carcinogens*—and in both cases the action resulted in a weaker standard than the institute had recommended.

Under Administration pressure—and to the distress of occupational health activists—the Labor Department has been seeking to turn enforcement of the Federal regulations back to state occupational safety and health divisions.

Robert E. Nagle, general counsel for the Senate Labor and Public Welfare Committee who is the main author of the Occupational Safety and Health Act, said that the states traditionally have had little interest or expertise in occupational health (as opposed to safety), and that state officials are likely to be more susceptible to pressure from local industry than Federal enforcement agents would.