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Memorandum

April 17, 1974

To: ORC Polyvinyl Chloride Task Force

From: *Leo* Teplow, *Wayne* T. Brooks, Bill Nichols
Bill

Preliminary explorations both with the companies and with appropriate people in OSHA indicate that the recently reported additional research results --- namely that white mice have incurred angiosarcoma of the liver at a concentration of 50 ppm of polyvinyl chloride --- lead to the tentative conclusion that the proposed mortality study of users of polyvinyl chloride (fabricators, processors, etc.) is more important than ever, provided that it can be done within a very limited time frame. On the other hand, it is possible that OSHA may be forced to take action before any study, no matter how expeditiously conducted, can be completed.

In order that we may reach a final conclusion as to the possible conduct of this study, we are calling a meeting of the Polyvinyl Chloride Task Force at 10:00 a.m., Tuesday, April 23, 1974 at ORC offices, 1660 "L" Street, N.W., Suite 210, Washington, D.C.

It is urgent that you not only attend this Task Force meeting, but that you come prepared to report on whether your company will commit itself to support of the study, along the lines suggested in our April 11 letter.

If it is decided that the study is to go forward, we would like your input in the determination of (a) what employees in what specific operations or occupations should be included in the universe; (b) should the study be limited to those exposed to a minimum of 12 years of work exposure to polyvinyl chloride;

ERG 106455

At a special meeting of the ORC PVC Task Force on April 9, ORC was requested to submit a proposal to the companies having substantial interest in the VC/PVC problem, in order that additional facts may be brought to bear on consideration of the final standard. Among the 12 companies represented at the April 9 special meeting of the PVC Task Force, there was no dissent as to the need to proceed with such a mortality study immediately, despite the extraordinary time restraints.

This letter is submitted as a proposal to those companies of the ORC OS&HS Group who have been involved, and, to other companies as information regarding an urgent and important undertaking. We propose the conduct of such a study on an emergency expedited basis, in order that some, if not all, the results may be available in time to use in the public hearing on the final standard - probably in August or September of 1974. The mortality study would consist of the following steps:

1. Collect from PVC manufacturers and other sources a list of users (processors or fabricators of PVC products).
2. Select initially from users those plants that
 - a. have used polyvinyl chloride for at least 12 years,
 - b. have reasonably complete personnel records, and
 - c. are agreeable to participate fully in the study.
3. Organize research teams of graduate students from selected universities.
4. Review personnel records to determine:
 - a. employees with at least 12 years in jobs in which vinyl chloride is used,
 - b. whether such employees are still living,
 - c. with respect to those who have died, ascertain cause of death.
5. Complete the evaluation and report.
6. Retain an outstanding toxicologist for:
 - a. consultation during the study, and
 - b. testimony as to its significance.

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