



INTERNAL CORRESPONDENCE

Exhibit B

CHEMICALS AND PLASTICS

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 Originating Dept.
 Answering letter date
 Subject Vinyl Chloride Research
MCA Report to NIOSH

CONFIDENTIAL

The Manufacturing Chemists Association selected the following persons to make a technical presentation to the National Institute of Safety and Health on the status of the vinyl chloride known health hazards and the current research program:

1. Dr. V. K. Rowe, Dow Chemical Company
2. Dr. W. E. Rinehart, Ethyl Corporation
3. Mr. R. N. Wheeler, Jr., Union Carbide Corporation
4. Mr. George E. Best, Manufacturing Chemists Association

Dr. David Duffield, Imperial Chemical Industries, was designated by the four European vinyl chloride resin producers to discuss European work.

The MCA group met with the Vinyl Chloride Industry Technical Representatives on July 11, 1973 to discuss the presentation, the objectives of the presentation, and limitations on the representatives. The presentation was to be oral with only copies of the study protocols and generally-known data provided for distribution. The objectives were to apprise NIOSH of vinyl chloride studies in progress and to avoid over-reaction by the Department of Labor and NIOSH should data become available from this or other sources.

Industry technical representatives were advised to consider statements to the press or to their employees should the data become generally known.

The MCA group, along with Dr. D. P. Duffield, met at MCA headquarters on July 16 and the morning of July 17 to prepare and review the presentation. Dr. V. K. Rowe was selected as spokesman for the group. Doctor Duffield was to present the European data. Mr. Bruce M. Barackman, an MCA attorney, provided advice on legal questions.

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The presentation was made at 1:00 P.M. on July 17, 1973 at NIOSH headquarters in Rockville, Maryland. Representing NIOSH were Dr. M. Key, Director of NIOSH, Dr. N. Mitchell, Dr. Donald Lassiter, Dr. Keith Jacobson, and Mr. Richard James.

An outline of the presentation is as follows:

1. Inductory remarks and purpose of visit.
2. A review of the size of the industry in the U.S. and the world (this was presented via handout).
3. A review of the history of vinyl chloride toxicology. (handouts of the vinyl chloride data from the ACGIH and the MCA technical data sheet were distributed).
4. A review of MCA and U.S. industry participation in the study of vinyl chloride hazards:
 - a) The MCA study of aroosteoalylsis epidemiology.
 - b) The MCA Occupational Health Committee's meeting with Dr. Viola following the publishing of his work.
 - c) The planning of vinyl chloride research by the MCA Industry Technical Group on Vinyl Chloride.
5. Dr. Duffield discussed work done or underway in Europe on vinyl chloride monomer studies.
 - a) I. C. I. did epidemiology study of all VC and PVC workers exposed between 1962 and 1972 without indication of hazard.
 - b) I. C. I. did epidemiology study of all VC workers exposed between 1946 and 1971 without indication of hazard.
 - c) The four European companies - I. C. I., Montedison, Rhône-Progil, and Solvay - sponsored the rat inhalation study now underway in Italy, with concentrations ranging from 50 to 10,000 ppm.

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5. d) The European group plans to do a feeding study and short-term inhalation studies on rats.
6. (Dr. V. K. Rowe resumed) The protocols of the inhalation study and the epidemiology study were reviewed. (Handouts of the study protocols and the MCA press releases were presented.)
7. Concluding remarks, asking for comments and cooperation. Study results will be made available to NIOSH when complete.

Comments and Questions:

Doctor Key: This is a fascinating presentation; we appreciate it. Too bad OSHA procedures are not more flexible. The existing tracking system makes work difficult, and we can't get caught up. We should be able to use representatives of industry, labor, and academic in some kind of seminar for preparing Criteria Documents.

Doctor Lassiter: Concerned about identifying exposure data on retrospective studies. Did not like Viola's work because animals died, were discarded, and replaced by new animals.

Doctor Jacobson: Is vinyl chloride an alkylating agent? Are foods affected?

Doctor Jacobson: What is the situation regarding the use of vinyl chloride as a propellant? Thought use was larger and was an industrial use. (He was informed that VC was used in pressurized spray cans of paint. VC represented about 25% of the propellant mix. The use is being discouraged by economics as well as hazard, and should be completely terminated by the end of the year.)

Unknown - possibly Doctor Lassiter to Doctor Duffield

What is the lowest VC concentration that you have found tumors? (Doctor Duffield stated that study was incomplete, but one tumor had been found at 250 ppm.)

Doctor Key: Mr. Herbert Stockinger should be consulted on the study protocols. MCA should contact him for a future discussion. I did not realize PVC was such a large industry.

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The MCA group and Doctor Duffield were invited to Doctor Key's office for further discussion of future industry aid with Dr. Herbert Christianson and Mr. Edward Baier, Assistant Director. Items discussed were:

1. NIOSH had a computer printout of 1100 possible or actual carcinogens.
2. Doctor Rowe discussed problems of the OSHA Carcinogen Advisory Committee. He called it a "snake pit", and hinted that the responsible members might all quit soon.
3. Doctor Rowe proposed that carcinogens be put in four or five classifications, depending on the known hazard.
4. MCA's facilities will be utilized to contact known producers of various materials requiring Criteria Documents.
5. Mr. Edward Baier proposed that an independent agent, such as a college professor, collect industry data on various materials and publish it so NIOSH can use the data. NIOSH is limited to generally known or published data.
6. Doctor Rowe met with Doctor Key in a separate office for approximately thirty minutes, at Doctor Key's request. Doctor Rowe commented that this private discussion of the carcinogen problem was worth the whole effort. He did not elaborate.

The consensus of the MCA group and Doctor Duffield was that the presentation was extremely well received and that the chances of precipitous action by NIOSH on vinyl chloride were materially lessened. NIOSH did not appear to want to alienate a cooperative industry or they did not want to know too much unpublished data.

These notes are subject to the human frailties and errors that always occur, and are intended to show the procedure and flavor of the presentation. Needless to say, any breach of the presentation's informal confidentiality could be extremely costly to industry.

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Copies of Criteria Documents on Chromic Acid and Toluene Diisocyanate were received and forwarded to Doctor Lane; these are the first published.

Very truly yours,

R. N. Wheeler, Jr.
R. N. Wheeler, Jr.

RNWJr/ra

(2 Enclosures to Dr. K. S. Lane)

