

Miller, Diane M. (CDC/NIOSH/EID)

From:
Sent: Monday, May 21, 2007 12:54 PM
To: NIOSH Docket Office (CDC)
Subject: IBM Endicott Study comments
Attachments: IBM CA study comments.doc

Attached are my comments to the feasibility study of cancer in the IBM Endicott employee population. Thank you for this opportunity to offer my input.

Date: 5/21/2007

To: NIOSH Docket Office, 4676 Columbia Parkway, MS C-34, Cincinnati, Ohio 45226

From:

RE: Comments to NIOSH feasibility study of cancer among IBM Endicott employees

After reviewing the draft document for the above named study I have the following comments:

- 1) In doing the power calculations, person-years has been used as the unit of analysis. There are problems with this approach. It generally assumes a constant hazards model. This was the model used in the Nurses' Health Study that led to the erroneous recommendation of HRT for menopausal women. See the 2005 Oxford publication by Kraemer, Lowe, and Kipfer *To Your Health* p. 90. Do you plan to analyze the Endicott data this way? Hopefully not.
- 2) Are you interested in CA occurring during the work years only or occurring during any point in time from 1965 to 2004, even into retirement?
- 3) Will different samples be selected from the defined database at different points in time – i.e., a true cohort study, and the CA diagnoses noted; or will there be a panel design in which the same employees are followed over the study duration and CA diagnoses are noted?
- 4) What time intervals will be used for determining the number of CA diagnoses or cancer rates? Yearly? Five-year intervals?
- 5) Why not use building as a first pass at the analyses the look at departments within buildings? Buildings bounded by Watson Blvd on the north, McKinley Ave on the east, and North St on the south traditionally housed "production". Also IBM's property was bounded on the east by a foundry and on the west by Endicott Johnson shoe factories (tanneries).
- 6) IBM pumped wastewater for many years into the Susquehanna River. Two pump houses were located on a relative's property at _____ Drive. This may have greater significance for the entire surrounding Endicott area.
- 7) IBM employee health records should be obtainable from Blue Cross/Blue Shield and from retirees Medicare and United Health Services Records.

- 8) Include all CA diagnoses and then sort on the cancers of interest. It is interesting to note that you have not included breast cancer and ovarian cancer. The rationale for this unclear as these cancers occur at a greater rate than does testicular cancer.
- 9) We received a letter from IBM last week stating that my sister's work history records were lost when a data file went missing. Will the loss of this database interfere in any way with your study?
- 10) Many of the "probable" chemicals listed in your feasibility study are associated with CNS effects, particularly with long-term exposure, according to the EPA and CDC websites. Why not capture possible CNS diagnoses codes in the data and save for a future study?
- 11) Will your sampling process capture a work history like my sister's? Her initial employment date was _____ and she retired from IBM on _____. She worked in _____ in buildings _____ an _____. She describes her work as building components, riveting, assembling boards/cards, soldering, doing touch-up, inspecting, and working on modules (not necessarily in that order). She vaguely remembers a chemical spill in the mid 80's. She was first diagnosed with _____ cancer in _____ and underwent a _____. She had a second reoccurrence in _____ and underwent a second _____. She also suffers from Parkinson's disease and has many psychological and neurological problems. (Our younger sister who lived in the area all her life died in _____ while undergoing chemo for ovarian cancer. There is no family history of cancer and I tested negative for BRCA1 and 2. Also, I have not lived in the Endicott area since _____)