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From: Dave LeGrande [LEGRANDE@cwa-union.org]
Sent: Monday, August 27, 2007 4:59 PM
To: NIOSH Docket Office (CDC)
Cc:
Subject: NIOSH Proposed Study- Docket Number 103
Attachments: DOC037.PDF

Please note the attached is specific to Docket Number NIOSH -103.

August 27, 2007

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

**CWA Comments Re: The NIOSH Proposed Cancer Study Among Former IBM
Employees Who Worked at the Endicott, New York, Manufacturing Facility**

The Communications Workers of America (CWA), AFL-CIO appreciates the opportunity to submit comments in support of the National Institute for Occupational Safety and Health (NIOSH) proposed cancer study among former IBM employees who worked at the Endicott, New York, facility. CWA believes that the proposed study would be of great benefit to the former and current IBM employees at the Endicott facility, thousands of employees in other IBM facilities, as well as to other electronics industry workers throughout the U.S. CWA represents over 700,000 U.S. workers employed within the telecommunications, broadcasting, cable TV, journalism, publishing, electronics, and general manufacturing, health care, and public and education sectors. Within CWA, since 1999, Alliance @ IBM-CWA Local 1701 has been representing the organizational issues/concerns (including occupational safety and health) of IBM workers. Relative to the NIOSH investigation, Alliance @ IBM-CWA Local 1701 is prepared to provide any necessary logistical support, including background information regarding work tasks and operations that might not otherwise be gleaned from the records review.

Based upon the NIOSH, "Feasibility Assessment for a Cancer Study Among Former IBM Employees Who Worked at the Endicott, New York, Plant" (March 2007), NIOSH has proposed conducting a \$3.1 million study to determine if there are excessive rates of cancer among a potential 28,000 former employees of the IBM printed circuit board manufacturing plant in Endicott, New York. This investigation would follow the findings of the aforementioned feasibility study that was focused upon identifying whether a more expansive scientific investigation could be conducted. The NIOSH feasibility study, which consisted of a review of relevant existing company personnel and industrial hygiene records, did in fact conclude that a retrospective cohort study of cancer mortality and cancer incidence is indeed scientifically feasible. Of significance, the feasibility study found:

- An estimated and significantly high number (n=10,492) of the 28,000 former IBM employees worked with and were exposed to numerous chemicals that were classified as "known," "suspected," or "possible" human carcinogens;
- An estimated 1,357 of the affected employees worked in departments where other toxic chemicals were used;
- When including affected workers who worked in additional departments not covered by the hard copy industrial hygiene records, but included within the electronic database, an estimated total of 16,565 (59%) of the 28,000 former IBM employees who worked at least one year after 1964 worked with and were exposed to cancer-causing and hazardous chemicals.

The proposed investigation would establish a study cohort of former employees who worked at least one year after 1964. Data from this cohort would be matched to national death data and state cancer registry information to determine cancer fatalities and incidence. In turn, the identified cancer rates would be compared to the cancer rates for the general U.S. population thus allowing the investigators to determine whether the former IBM workers experienced high rates of cancer. In addition, incidence of cancer among workers who were potentially exposed to hazardous chemicals or who worked in departments where chemicals were used in the manufacturing of circuit boards and their components would be evaluated and the investigation would address the issue of qualitative exposure categories.

Given additional questions regarding the contribution of workplace chemical exposures to the development of certain cancers, NIOSH has also proposed conducting a case-control study designed to more adequately distinguish the contribution of workplace chemical exposures from the contribution of non-work related variables to identified cancer cases. Data from such a study would be an invaluable addition to this important scientific issue.

Another important component and outcome of the study would be the evaluation of all relevant occupational exposure and related health problems. In turn, such information could be used to address important concerns of affected workers (and, similarly, community members). For example, associated with exposure to certain hazardous chemicals, the scientific study would be able to determine whether or not former workers are more likely to develop or die from specific cancers than the general U.S. population. By focusing upon the relationship between workplace exposures to hazardous chemicals and non-occupational factors, the investigation would also be able to identify the contribution of such workplace exposures and non-occupational variables in causing and/or contributing to worker and community member health problems, e.g. reproductive health outcomes.

The proposed NIOSH cancer study would add significantly to an understanding of multiple chemical exposures and the development of chronic diseases. Most studies, and consequently all the existing occupational health standards of exposure, are based upon a review of single chemicals in isolation. However, this is not how exposures occur in the real world in workplaces like the Endicott facility. The nature of the work and exposures at the Endicott facility, therefore, present a unique opportunity to both evaluate the effects of multiple chemical exposures, as well as to evaluate the potential contributions to risk of specific chemicals. While there were many chemicals used in the plant, different departments utilized different chemical processes. Different groups of workers were exposed to different types and/or amounts and/or combinations of these chemicals. Therefore, assessing cancer rates by department may make it possible to look at the relative risk of specific chemicals or chemical combinations to the development of cancer.

While the proposed NIOSH study would focus on former employees, the benefit to current employees at the Endicott facility cannot be overstated. The wastes from some of the chemical processes that used to exist and that have since been replaced, still remain in pools or dirt beneath the buildings and are thus a potential source of on-going exposures to the current employee population. Results from the proposed NIOSH study could potentially influence the protection of current employees and the removal of these toxic wastes, as well as lead to pollution prevention measures and cleaner processes moving forward. This would be a positive outcome for all affected – employees, the community, and the company itself.

Another important feature of the NIOSH study would be the ability to characterize and evaluate the chemical exposures and related worker health outcomes at the Endicott, New York, facility and, in turn, generalize these findings to other U.S. electronics facilities and affected workers. (According to the U.S. Department of Labor- Bureau of Labor Statistics, more than 1,000,000 U.S. workers are employed within the electronics industry, including circuit board manufacturing). As identified in a CWA review of relevant scientific studies specific to working conditions within the U.S. electronics industry, many of the same chemical products are used and many of the same work processes are conducted by affected workers. Thus, regardless of the employer and work location, one might anticipate identifying similar working conditions and health problems among comparable workers involved in similar work processes. Action taken to generalize the findings from the NIOSH study in Endicott would prove to be a significant achievement in terms of the health and well-being of all affected workers.

Further, data from the NIOSH investigation would be an important addition to the relatively sparse amount of data targeting the identified health concerns and, thus, would produce invaluable information in the conducting of future scientific studies involving other workers employed within the U.S. electronics industry.

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For all the reasons cited above, CWA urges NIOSH to implement the groundbreaking "Proposed Cancer Study Among Former IBM Employees Who Worked at the Endicott, New York, manufacturing facility." We thank you in advance for your consideration of this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Cohen". The signature is stylized with a large, looping initial "L" and "C".

Larry Cohen
President