

Dragon, Karen E. (CDC/NIOSH/EID)

From: Richard Clapp [rclapp@bu.edu]
Sent: Monday, August 27, 2007 11:13 AM
To: NIOSH Docket Office (CDC)
Subject: 103 - Endicott Project Comments

Attachments: EndicottNIOSH.doc



EndicottNIOSH.doc
(578 B)



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NIOSH Docket Office
4676 Columbia Parkway
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Re: Docket Number NIOSH-103

Dear Sirs/Madams:

The purpose of this letter is to urge NIOSH to carry out the proposed cancer study among former IBM employees who worked at the Endicott, New York facility. I previously submitted comments on the feasibility study, emphasizing the need to compare Endicott workers to other workers, either through an internal analysis, such as an SMOR approach or by comparing deaths to rates in other working populations. This would avoid the "healthy worker effect" in the cohort mortality study.

The "Feasibility Assessment for a Cancer Study Among Former IBM Employees Who Worked at the Endicott, New York Plant" (March 2007) by Dr. Lynne Pinkerton and her colleagues detailed the exposures to a wide variety of carcinogenic and toxic chemicals. I found similar exposures to workers at other IBM facilities during my work analyzing the mortality patterns in the San Jose, East Fishkill, Rochester and Essex Junction plants. The proposed Endicott study would add to the literature on this "under-studied" industry in the U.S. and would have worldwide implications.

I strongly urge NIOSH to proceed with the proposed work to determine if there are elevated rates of cancer among former IBM employees who worked at the Endicott, New York facility.

Sincerely,

Richard W. Clapp, D.Sc., MPH
Professor