

Western New York Council on Occupational Safety and Health

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

August 24, 2007

Re: Docket Number NIOSH-103

To Whom It May Concern:

I am writing this letter of support on behalf of the Western N.Y. Council on Occupational Safety and Health to urge that the National Institute for Occupational Safety and Health (NIOSH) provide funding for the proposed cancer study among former IBM employees who worked at the Endicott, New York facility. WNYCOSH has a long history of working with workplace and environmental victims of toxic exposures both at worksites and residential toxic waste sites (including Love Canal and Durez in Western N.Y.). We strongly believe that residents have the right to know what potential exposures they may have encountered and what adverse health effects that may have resulted.

The proposed NIOSH cancer study would be of great benefit to the former and current IBM employees at the Endicott facility, to employees at other IBM facilities, and to the over 1 million employees in the electronics industry nationwide. Elevated risk of cancers has been found in the Endicott community by the NYS Department of Health and yet, no such study has been conducted on those most exposed and at greatest risk - the former workers in the IBM facility itself. The NIOSH, "Feasibility Assessment for a Cancer Study Among Former IBM Employees Who Worked at the Endicott, New York Plant" (March 2007), confirmed that an estimated and significantly high number of the 28,000 former IBM employees worked with and were exposed to numerous carcinogenic and other hazardous chemicals. The NIOSH feasibility study also concluded that a retrospective cohort study of cancer mortality and cancer incidence is indeed scientifically feasible using existing company personnel and industrial hygiene records. The proposed cancer study would lead to an increased understanding of the risks associated with multiple chemical exposures and the development of cancer. This has broad implications for occupational health, in general, and could also potentially lead to pollution prevention and other process safety innovations within the electronics and other industries.

For these reasons, it is imperative that NIOSH proceed with the proposed cancer study to determine if there are elevated rates of cancer among former IBM employees who worked at the Endicott, New York facility.

For G. Cook