



## ADVISORY BOARD ON RADIATION AND WORKER HEALTH

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January 17, 2007

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The Honorable Michael O. Leavitt  
Secretary of Health and Human Services  
Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

Dear Mr. Secretary:

The Advisory Board on Radiation and Worker Health (The Board) has evaluated SEC Petition-00049 concerning workers at the Monsanto Chemical Company in Dayton, Ohio under the statutory requirements established by EEOICPA and incorporated into 42 CFR Sec. 83.13 and 42 CFR Sec. 83.14. The Board respectfully recommends a Special Exposure Cohort (SEC) be accorded to all Atomic Weapons Employees who were monitored, or should have been monitored for radiation, while working at Monsanto Chemical Company Units I, III, or IV in Dayton, Ohio for a number of work days aggregating at least 250 work days during the period of January 1, 1943 to December 31, 1949, or in combination with work days within the parameters established for other classes of employees included in the SEC. The Board notes that although NIOSH found that they were unable to completely reconstruct radiation doses for these employees, they believe that they are able to reconstruct components of the internal dose (i.e., polonium exposures) and external dose (with the exception of neutron exposures), and therefore individuals with non-presumptive cancers may be considered for partial dose reconstructions.

This recommendation is based on the following factors:

- People working in the above listed areas of the Monsanto Chemical Company in Dayton, Ohio were exposed to polonium, thorium, uranium, and other radioactive compounds while working on nuclear weapons production. In reviewing the available monitoring and other data for these operations, NIOSH found that for workers in Units I, III or IV at this facility, it did not have access to sufficient information, including personnel dosimetry, workplace monitoring data, or sufficient process and radiological source information, that would allow it to estimate with sufficient accuracy the external exposures to neutrons and internal doses to radionuclides other than polonium. The Board concurs with this determination.

- NIOSH determined that health may have been endangered for the workers exposed to radiation in the above listed areas of the Monsanto Chemical Company in Dayton, Ohio within the time period in question. The Board concurs with this determination.

Enclosed is supporting documentation from the recent Advisory Board Meeting held in Naperville, Illinois and the January 11, 2007 conference call where this special exposure cohort was discussed. If any of these items are unavailable at this time, they will follow shortly.

Sincerely,

A handwritten signature in black ink that reads "Paul L. Ziemer". The signature is written in a cursive style with a large, sweeping flourish at the end.

Paul L. Ziemer, Ph.D.  
Chairman

Enc.