

From: "Green, Edward" <EGreen@crowell.com>
Date: July 2, 2015 at 3:54:04 PM EDT
To: Dan Greenbaum <DDGreenbaum@healtheffects.org>
Cc: Fred A von Ahrens <fred.von.ahrens@tronox.com>
Subject: Fwd: Health Effects Institute reponse letter 6.5.15 (Tronox Alkali)

Dear Dan,

Thank you for your email of June 17 below. Again, please know that it is our strongly held desire to work constructively with you and your staff at the Health Effects Institute (“HEI”) and the HEI Diesel Epidemiology Panel.

However, we are disappointed with what you have said in response to our comments for the following reasons. You say that the “Panel was never constituted to conduct a full scale re-analysis of the DEMS or any other study, nor to visit all of the many locations in” DEMS. In saying that, you referred us to the attached charge. Dan, we have read that charge and simply note that it specifically says that the Panel will work over the next 15-18 months to . . . “[r]eview in detail the newest published studies, as well as critiques published to date. . . .” We do not believe the Panel has done that; and your email below confirms that omission to be the case.

Furthermore, we are not asking you and the Panel to visit all of the many locations in DEMS. Rather, we simply invited you all to visit the Tronox Westvaco Mine. We thought visiting at least one Mine would be especially important, because in looking at the roster of Panel Members, we noted that not only are all of the Panel Members academics, but also not one mining engineer is among them and only one Member has any expertise in diesel technology. At the very least, a mine visit would have helped to effectively familiarize the Panel with the context of DEMS. Most importantly, a visit would make most vivid the comments we have made about the diversity of the mines in DEMS. Obviously, a visit to the Limestone Mine A, in addition to the Tronox Westvaco Mine, would make that diversity even more apparent.

We will look forward to the publication of the HEI Panel’s report and are hopeful it will be a fair and balanced document. In our opinion, it is critically important that the report include a clear description of the different mines, including their mode of operation, use of diesel equipment, and ventilation practices. This information should be linked to a discussion of the well-known major shortcomings in the exposure assessments used in the epidemiological analyses conducted by the NIOSH and NCI investigators. Should the report not be a fair

and balanced document assessing the use of DEMS for quantitative risk assessment (“QRA”), we expect we will be communicating with you further.

Sincerely,

Fred von Ahrens

Ed Green

From: Dan Greenbaum [<mailto:DDGreenbaum@healtheffects.org>]
Sent: Wednesday, June 17, 2015 9:55 AM
To: Tricia Angelovich; dkrewksi@uottawa.ca
Cc: Fred von Ahrens; Katherine Walker; Green, Edward; Rashid Shaikh
Subject: RE: Health Effects Institute reponse letter 6.5.15 (Tronox Alkali)

Dear Ed and Fred:

Thank you for your letter and extended comments. We appreciated your attending our Annual Conference and sharing your views – and clarifying in your letter both the tremendous steps that Tronox has and is taking to address the operation of its mines – and the degree to which you have in the past and do now use diesel engines in some activities. I had been aware for some time through Ed Green of FMC’s decision to approach the occupational and other issues involved here in a constructive fashion and applaud you for continuing that.

We also appreciated your sending further detailed comments as well as a copy of the FOIA request data which HEI had received earlier and provided to the members of the Panel most focused on assessing the retrospective exposure assessment in DEMS. The Panel has now, in keeping with longstanding practice at HEI (as well as the National Research Council) received detailed peer review comments from both outside peer reviewers and the investigators of both the DEMS studies and the further analyses conducted in the data by Kenny Crump and Suresh Moolgavkar and their colleagues. We do not normally share the findings before final publication as we did at the Annual Conference, but were pleased to do that and offer a number of the participants the opportunity to provide additional comments to complement those the Panel had already received.

We appreciate your offer to both host Panel members at your mine and to meet with us further. The Panel, which was never constituted to conduct a full scale re-analysis of the DEMS or any other study, nor to visit all of the many locations in the mining and truckers studies (see attached charge), has placed its first priority now onto digging deep into this wide set of comments and making sure that their final report fairly and impartially addresses all of the relevant analyses done to date, and captures what we know about the potential risks of diesel exhaust, as well the major uncertainties in the recent diesel epidemiology studies. Thus at this stage we are not arranging further consultations with any of the investigators or other interested parties but will

certainly make sure that if your submissions raise new issues above and beyond those already received that the Panel is made fully aware of them.

As I noted in a letter to Roger just after the Conference, no one is more committed than I am to ensuring that this Panel's report lives up to the highest standards of quality science and impartiality that is a hallmark of HEI's work, and I have every confidence that, with the benefit of the extensive input already received, the panel will accomplish that goal.

Sincerely,

Dan

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From: Tricia Angelovich [<mailto:Patricia.Angelovich@tronox.com>]
Sent: Friday, June 05, 2015 4:22 PM
To: Dan Greenbaum; dkrewksi@uottawa.ca
Cc: Fred von Ahrens
Subject: re: Health Effects Institute reponse letter 6.5.15 (Tronox Alkali)

Gentlemen,

Good afternoon. Please see the attached documents that were sent to you via FedEx today, June 5, 2015. If you have any questions or concerns, please feel free to contact me at the number listed below.

All the best,

Tricia Angelovich

Executive Admin. Assistant