

07_TOXICDOCS_FINDINGS

STRAND IV — The ToxicDocs footprint (251 documents, mined locally)

*Added after the initial dossier. ToxicDocs' native search returns **251 documents** matching "Frawley"; all 251 were downloaded to `./toxicdocs/` (trriage-sorted filenames + `.txt` sidecars + `_INDEX.md`; manifest in `_manifest.json`) and full-text-mined. This corrects and substantially enriches Strand I.*

Triage (from OCR snippets, then verified against full text): 59 **confirmed** our Frawley · 88 **likely** · 72 **unclear** · 32 **no**. Confirmation is unambiguous — multiple documents read e.g. "Jack Frawley, Chief Toxicologist, Hercules Inc" and "Frawley, John P., Ph.D., Hercules Powder Company, Delaware Trust Bldg." ("Jack" = John). The set spans the **vinyl-chloride (PVC), PCB, lead, asbestos, and dioxin** product-defense collections — establishing Frawley as a **ubiquitous chemical-industry toxicology figure**, not just Hercules's in-house man.

1. Strand I, transformed: the de minimis proposal was an organized INDUSTRY CAMPAIGN

The largest and most important cluster (the Allied Signal / Society of the Plastics Industry vinyl-chloride files, 1966–1972) is not about PVC toxicity at all — it is the **plastics- and chemical-industry coalition's internal correspondence promoting and negotiating Frawley's 0.2% / 0.1 ppm proposal with the FDA**. The proposal had become industry shorthand — the "**Frawley proposal**," "**Frawley concept**," "**Frawley doctrine**," "**Frawley hypothesis**," "**Frawley limiting value**." This is far richer than the secondary Keller & Heckman account and is all [**CONFIRMED-primary**] (local files):

- **The proposal in industry words:** a 1968 file paraphrases "...*indirect additives — except for pesticides and heavy metals — used in accordance with good manufacturing practices at 0.2% or less be exempted from FDA's procedural food additive requirements.*" (2likely...nka82JK.../PVC).
- **FDA actually engaged and counter-proposed:** "the agency would not accept the Frawley proposal, as such, but hinted that..." and "Among the differences between the Frawley proposal and FDA's draft proposal..." — i.e., FDA drafted its **own in-house version** and negotiated differences (so "serious consideration" meant active drafting, not mere politeness).
- **Coordinated lobbying machinery:** 40 of the 251 files mention the **Manufacturing Chemists Association**; documents show *Food Chemical News* coverage tying the idea to "the so-called 'Frawley proposal' and the

National Academy of [Sciences]"; industry committees urging FDA to "endorse the Frawley proposal." Frawley is described **leading an industry delegation to FDA** and sitting on a "**three-man**" **negotiating/advisory committee** on food-packaging additives (1971), and **advising the MCA on food/chemical legislation** and the **Delaney Clause** (1972).

- **Contemporaneous confirmation of the Sept 1966 ACS debut:** "Frawley has done more work in this field since the presentation of this paper in September of 1966 to the American Chemical Society." (1967 PVC file) — independent primary corroboration of the ACS-paper date.

Net effect: the de minimis episode is upgraded from "a toxicologist's published proposal that FDA mullied" to "**the banner of a multi-year, multi-association industry campaign — authored by a Hercules toxicologist — to write a self-exempting threshold into FDA food-packaging law,**" with FDA drawn into active counter-drafting. This is the strongest available evidence for the memo's industrial-role thesis.

2. The product-defense breadth (beyond food packaging)

Frawley recurs across unrelated toxic-tort collections as the industry's reassuring toxicologist:

- **1958, Monsanto/PCB file** — a confidential letter to toxicologist **Harold C. Hodge** enclosing "results given to me by Dr. Frawley... although Frawley doesn't consider the materials as being particularly toxic" re **Pydraul 150 / Cellulube 220** (phosphate-ester functional fluids). A vivid "confidential, not-very-toxic" vignette. (1yes...702QvRV...)
- **Lead, asbestos, PCB, dioxin collections** — Frawley appears in rosters, citations, and committee papers (e.g., a 1973 lead-industry document naming "Frawley... Chief Toxicologist of Hercules Inc., Wilmington"; a 1965 dioxin/2,4,5-T document citing "FRAWLEY, J.P."). His **1966 DDT/toxaphene hepatic-microsomal-enzyme paper** was circulated by **Monsanto in its PCB defense** — cited in a 1969 Monsanto preprint by Street et al. (see §4 correction).
- **Industrial-hygiene community:** a **1959** AIHA-type roster lists "Frawley, John P., Ph.D., Hercules Powder Company, Delaware Trust Bldg." among occupational-health figures (Mary Amdur, Kettering/PHS Cincinnati names) — consistent with his 1964 AIHA "Emergency Exposure Limits" committee work.

3. Disambiguation finding — a genuine SECOND "John P. Frawley, Ph.D."

Reading the full text corrected two snippet-level over-attributions and surfaced a real namesake:

- A **1949** journal-index item credits a "**Frawley**" with work on "**chronic beryllium poisoning**" and "**pulmonary function in patients**" (and elsewhere cortisone/ACTH therapy, PHS/Cincinnati milieu). This is **NOT our food-packaging toxicologist** — it is a clinical/occupational-lung researcher. **There were at least two (probably three) mid-century "John P. Frawley"s**: (a) our FDA → Hercules food/regulatory toxicologist; (b) a **beryllium / occupational-lung** researcher (~1949); and the separately-flagged (c) the **1953 46th-MASH / 1955 combat-casualty** Army surgical-research officer (still unresolved whether (a)=(c)). *Treat 1949–early-1950s "John P. Frawley, Ph.D." occupational-lung items as (b), not our man.*

4. Corrections to the snippet-triage (made on reading full text)

- **No new Frawley PCB paper.** The "1969 Monsanto PCB hepatic-microsomal" document is authored by **J. C. Street, F. M. Urry, D. J. Wagstaff & A. D. Blau**; "J. P. Frawley" appears only in its **references** (his 1966 Kinoshita–Frawley–DuBois paper). *Do not add a PCB publication to the bibliography.* (Still notable: his work was deployed in Monsanto's PCB defense.)
- Some `1yes` **asbestos-collection** items (1949) are the **namesake (b)**, not our man — see §3. The `_manifest.json / _INDEX.md` `ourFrawley` flags are from the OCR snippet; trust §3–§4 where they conflict.

5. Using the local archive

- `./toxicdocs/_INDEX.md` — all 251, grouped `1yes / 2likely / 3unclear / 4no`, with one-line context.
- Filenames: `<triage>__<year>__<firm>__<substance>__<hash>.pdf (+ .txt)`. Sort to put confirmed first.
- **Highest-value files to read first:** the `1yes...PolyvinylChloride` cluster (the de minimis campaign) and `1yes...702QvRv...` (the 1958 Pydraul/Hodge letter).
- **Still needs the operator** (sandbox DNS/403): the UCSF Darby/tobacco Frawley letters, the Rulis 1987 chapter, the NAP 1969 monograph — see `05_OPEN_QUESTIONS` Draft 3 and `sources/_SOURCES_INDEX.md`.