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# Abstract

(Limit: 250 words)

**Background:** Non-Hodgkin lymphoma (NHL) incidence has increased substantially in the US and was recently linked to workplace exposure to soluble metalworking fluids (MWF) in a standard survival analysis of the United Auto Workers-General Motors (UAW-GM) cohort. Here, we estimate the effects of hypothetical interventions on soluble MWF exposure in relation to NHL risk in the same cohort of autoworkers. Estimation of causal effects requires positivity, which we guarantee by investigating causal contrasts that are supportable by the data.

**Methods:** We estimated counterfactual risk of NHL between 1985 and 2015 in the UAW-GM cohort of autoworkers at three Michigan plants (n = 33,134) under hypothetical supportable interventions on exposure to soluble MWF. A supportable intervention reduces annual daily average exposures above a specific target limit to that limit when supported by data. Otherwise, the supportable intervention reduces exposure to the highest level below the target limit or not at all, depending on support.

**Results:** 339 NHL cases occurred over the 30-year follow-up period. Stronger target limits on soluble MWF exposure resulted in monotonic reductions in NHL risk. Setting the target exposure limit at 0.5 mg/m3, the NIOSH recommended exposure limit, would have prevented 112 (95% CI: 57, 181) cases.

**Conclusion:** More stringent limits on exposure to soluble MWF provide stronger protections against NHL. We expect the effects of enforcing the target exposure limits uniformly to have even stronger protective effects. Strengthening exposure limits for MWF may protect workers from NHL during the anticipated boom in domestic manufacturing.

# Introduction

Non-Hodgkin Lymphoma (NHL) incidence in the United States doubled between 1973 and 1994, before plateauing at around 19 per 100,000 persons per year, making it the seventh most common cancer in the country.1,2 The strongest known risk factor of NHL is immunosuppression, both congenital and acquired.3,4 However, since immunodeficiency and infection with HIV are rare, they cannot fully explain the historic rise or present burden of NHL.5 The rise in NHL incidence coincided with a period of rapid and extensive chemicalization in industry, agriculture and warfare; environmental and occupational exposures may play an important explanatory role in the epidemiology of NHL.6,7

Pesticide exposure among workers in agricultural settings was a common target of NHL research in recent decades. A meta-analysis of 44 articles published between 1980 and 2014 found statistically significant associations between NHL and exposure to several classes of pesticides including carbamate, organophosporus, triazine, and organochlorine.8 Occupational exposures associated with NHL are not limited to the agricultural sector, however. Occupational groups associated with NHL risk also include metal processors, health workers, salespeople, machinists, and electricians.2,9,10 Workers in these occupational groups often come into contact with industrial chemicals such as gasoline, solvents, coolants, and lubricants such as metalworking fluids (MWF).

Metalworking fluids are complex mixtures of oil, water, and chemical additives that cool and lubricate metal machining operations. There are three general types of MWF: straight, soluble, and synthetic. During shaping, grinding, and cutting operations, MWFs are misted, poured, or blasted at high pressure onto work surfaces to remove debris, cool metal, improve efficiency, and prevent deterioration of tools. Although MWFs are essential to manufacturing processes, they also present a potential health hazard to exposed workers through inhalation or ingestion of MWF particulate mass. In response to health concerns related to the carcinogenicity of polycyclic aromatic hydrocarbons (PAHs) in mineral oil as well as the rising global cost of oil products, water-based soluble MWF, which usually contain about 40-70% oil by weight, were developed to replace oil-based straight MWF.11–13 Today, soluble MWF is the most common type of MWF in metal machining operations.14

One challenge in estimating the causal effects of occupational exposures on worker health is the Healthy Worker Survivor Effect (HWSE), the process by which healthier individuals remain at work where they accumulate more exposure while those more susceptible to the deleterious health effects of exposure leave work.15 An early causal inference method in statistics developed to estimate causal effects in longitudinal observational studies where the HWSE or other forms of time-varying confounding/selection bias affected by past exposure may be operating is the parametric g-formula.16–18 A central requirement necessary for causal inference from observational data is positivity (overlap) ie adequate variation in the exposure of interest within strata formed by confounder and exposure histories.19

Common approaches for addressing violations in positivity are model-based smoothing when using outcome regression methods, weight truncation when using propensity methods, or a combination of both. Another approach is to only consider causal contrasts that are supported by the observed data ie those involving hypothetical interventions with propensity score strictly greater than zero. Here, we defined hypothetical supportable interventions on exposure to soluble MWF in the United Auto Workers-General Motors (UAW-GM) occupational cohort and estimated their effects on NHL incidence between 1985 and 2015 relative to no exposure intervention while guaranteeing positivity.

# Methods

We estimated the cumulative incidence of NHL between 1985 and 2015 under supportable interventions based on selected target exposure limits on annual average daily exposure to soluble MWF by applying the the hazard-extended iterative conditional expectation (ICE) parametric g-formula.20 First, we estimated the expected number of NHL cases that we would observe if there were no censoring and no limit on exposure. Then, we contrasted this case count to that under supportable interventions based on five hypothetical target exposure limits and no censoring. The five target exposure limits were (1) 2.0, (2) 1.0, (3) 0.5, (4) 0.25, and (5) 0.05 mg/m3. The National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) for time-weighted average total particulate mass (PM) composed of MWF is 0.5 mg/m3.21

For each target exposure limit, period of follow-up, and strata defined by unique combinations of confounder and exposure histories, we found a supportable exposure limit, which was the maximum observed value of exposure at or below the target exposure limit, if such a value exists. If all of the observed values were above the target limit, the supportable limit was simply the maximum observed value. The supportable intervention rule then reduces exposures above the supportable exposure limit to that limit, but allows exposures at or below the limit to vary according to their observed distribution. Applying the supportable intervention rule to the observed distribution of exposure produces the intervention distribution that defines the corresponding stochastic dynamic intervention with guaranteed positivity. We estimated the effect of supportable intervention rules based on the selected target exposure limits, expressed as stochastic dynamic interventions, using the hazard-extended ICE parametric g-formula.20

Figure 1 presents three example scenarios where the target exposure limit is 0.25 mg/m3 in all cases, but the supportable exposure limit differs depending on what the observed data supports. In Figure 1a, the supportable exposure limit is equal to the target exposure limit as some individuals with that particular set of potential confounder and exposure histories were observed to have experienced exposure at that level. In Figure 1b, the supportable exposure limit is below the target exposure limit. In Figure 1c, there is no limit on exposure because no individuals in that stratum experienced exposure below the target exposure limit.

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| --- | --- |
| |  | | --- | |  |   Figure 1: Observed and post intervention distribution of nonzero exposure for three distinct confounder and exposure histories before and after applying the supportable intervention rule. |

## Study population

We used data from the UAW-GM cohort study, which included all hourly workers at three automobile manufacturing plants in Michigan who had worked at least three years by 1985. Past papers provide detailed descriptions of the cohort.22,23 The large size of the study population and rich time-varying, quantitative MWF exposure data enable the study of a relatively rare cancer and evaluate realistic interventions on MWF exposure in a longitudinal cohort setting. The present study population (N = 33,134) was restricted to the autoworkers who were at work in 1941 or not yet hired, missing no more than half of their employment history, and still alive at the start of follow-up for cancer incidence on January 1, 1941. Autoworkers in the study population were followed until NHL diagnosis, death, December 31, 2014, or the oldest observed age at death, whichever came earlier.

## Outcome and potential confounders

We identified incident cancers in the UAW-GM cohort between 1985 and 2014 by linkage to the Michigan Cancer Registry (MCR). Workers at Plants 1 and 2, located in the greater Detroit metropolitan area, were also linked to the Detroit Regional Registry of the Surveillance, Epidemiology, and End Results (SEER) Program. Cancer types were distinguished using site and histology codes conforming to the International classification of Diseases for Oncology, 3rd edition (ICD-O-3). Non-Hodgkin lymphoma was defined by cancers with any of the following ICD-O-3 histology codes: 9590-9597, 9670-9671, 9673, 9675, 9678-9680, 9684, 9687-9691, 9695, 9698-9702, 9705, 9708-9709, 9712, 9714-9719, 9724-9729, 9735, 9737-9738, 9811-9818, 9823, 9827, 9837. Details regarding cancer incidence follow-up are described elsewhere.24 Vital status was ascertained from company records and by linkage to Social Security Administration, National Death Index, and state mortality files.

Potential confounders including year of hire, sex, race, time off work, employment status, and plant location were obtained from company records. Race was missing for about 16% of the cohort, most commonly among workers hired before 1960 in Plant 2. In analyses, missing race was considered a distinct category. All potential confounders were coded as categorical variables. Cut-points for categorizing continuous covariates were determined according to the quantiles among cases.

## Exposure

Quantitative measurement of time-varying MWF exposure is a distinguishing strength of the UAW-GM cohort study relative to other environmental or occupational health studies. Exposure assessment was based on direct air sampling as well as company records. Company industrial hygienists collected several hundred personal and area samples for total particulate mass (mg/m3) composed of MWF over many decades. Research industrial hygienists collected additional air sampling data when the cohort study was launched in the mid 1980s.25,26 These additional data combined with historical data and company records constituted a job-exposure matrix of quantitative 8-hour time-weighted average daily exposure estimates to soluble, straight, and synthetic MWF for each combination of job, department, and plant over time.27 Workers’ annual average daily exposure to each MWF type was determined by combining this job-exposure matrix with employment records, which recorded time-varying job type, department, and plant for each employee from hire to termination or 1995, whichever came sooner. For employment records that were at least half complete, gaps in the record were interpolated by carrying forward the last known job type. The exposure assessment is described in detail elsewhere.25,27,28

In previous analyses of NHL, exposure lags of 1 to 20 years were applied to account for disease latency; we lagged cumulative MWF exposures by 20 years.29–31 In analyses, MWF exposure history at start of follow-up was summarized as the cumulative sum of average exposure intensities. Exposure was coded as categorical variables with cut-points at zero and the quintiles of nonzero exposure among cases. We estimated the effects of hypothetical interventions on soluble MWF, the type of MWF used most widely and in the greatest quantities while treating co-exposure to straight and synthetic MWFs as potential confounders.

## Hazard-extended ICE parametric g-formula

We split the 30-year follow-up period into ten time periods based on the deciles of the dates of diagnosis of NHL. The number of years per period ranged from two to four. The hazard-extended ICE parametric g-formula involves two stages. In the first, we estimate counterfactual discrete hazards over the person-periods. In the second, we pool those estimates to estimate the counterfactual risk over the entire follow-up period. During pooling, we iteratively combine estimates of the counterfactual hazard to obtain a pooled estimate over an increasing number of periods starting from the last period. In each iteration, we perform model-based standardization over exposure and covariate histories before combining the counterfactual discrete hazard estimate with the estimated hazard pooled over subsequent periods. This iterative process results in a sequentially standardized estimate of the counterfactual cumulative incidence of NHL when the intervention of interest is enforced over all follow-up periods.

We investigated supportable interventions that guarantee positivity: every value of exposure that could be assigned under the our stochastic dynamic intervention has propensity score strictly greater than zero. We treated co-exposure to straight and synthetic MWF, employment status, cumulative time off, age, duration of employment, sex (male/female), race (Black/white/unknown), and plant (Plant 1/Plant 2/Plant 3) as potential confounders. Exposure to MWF, employment status, time off, and duration of employment were lagged 20 years. An overview of the general steps of the estimation procedure are presented below. Note that we refer to discrete hazards simply as hazards.

1. Fit a pooled logistic regression model for NHL on potential confounders and exposure over all at-risk person-periods.
2. Predict the hazard for each person-period for each possible level of exposure using the model from step 1.
3. Within strata formed by unique combinations of potential confounders and exposure, obtain the intervention distribution of exposure by applying the supportable intervention rule to the observed exposure distribution.
4. Within strata, estimate the counterfactual hazard for each person-period by taking a weighted sum of the predicted hazards from step 2.
5. Starting at the penultimate period of follow-up, estimate the pooled counterfactual hazard:
   1. Regress the counterfactual hazard pooled over all subsequent periods on all past potential confounders and exposures.
   2. Predict the pooled hazard for each person at risk at the start of the period and each possible level of exposure using the model from (a). Retrieve the predicted hazards from step 2. For each person and level of exposure, multiply the predicted pooled hazard by one minus the corresponding predicted hazard. Then, add the predicted hazard to the product.
   3. Within strata formed by potential confounder and exposure histories, obtain the intervention distribution of exposure by applying the intervention rule to the observed exposure distribution.
   4. Within strata, estimate the counterfactual hazard pooled over the present and subsequent periods for each person by taking a weighted sum of the predicted pooled hazards from (b).
   5. If the present period is not first period, set the reference period to the preceding period and return to (a).
6. Compute the counterfactual risk by averaging the pooled counterfactual hazards across all persons.

To account for censoring, fit the models in step 1 and step 5a among those who were not censored and obtain predicted hazards for all at-risk person-periods, including those that were censored.

We estimated cumulative incidence under no intervention on soluble MWF and under the supportable interventions based on the five selected target exposure limits. We contrasted the cumulative incidence under the supportable interventions to that under no intervention on exposure by computing the number of cases averted and the cumulative incidence ratios. Confidence intervals were computed using the basic nonparametric bootstrap with 1000 Monte Carlo samples from the population at the start of follow-up. All the necessary scripts used to reproduce the analyses are available on [GitHub](https://github.com/kvntchn/gm-nhl-ice).

# Results

Table 1 presents summary statistics for the full study population and among those diagnosed with NHL between 1985 and 2015. The cohort is predominantly white (64%) and male (86%). Year of hire and age at hire were approximately the same among those with NHL and the full study population. Median lagged cumulative exposure to all three types of MWF was higher among NHL cases. Soluble MWF were the most widely used type, with approximately 88% of workers ever exposed. Median cumulative exposure among the exposed was approximately 6 times higher for soluble than for straight MWF. Figure 2 shows median annual average daily exposure to the three MWF types among exposed workers over calendar time. Exposure to MWF generally followed a downward trend over time.

**Table 1:** Summary of population characteristics. Statistics shown above the horizontal line are count (%). Those shown below are median (quartile 1, quartile 3).

|  | Study population | |  | NHL cases | |
| --- | --- | --- | --- | --- | --- |
| N (person-years) | 33,134 | (794,733) |  | 339 | (5,809) |
| Race |  |  |  |  |  |
| White | 21,315 | (64%) |  | 250 | (74%) |
| Black | 6,250 | (19%) |  | 40 | (12%) |
| Unknown | 5,569 | (17%) |  | 49 | (14%) |
| Sex |  |  |  |  |  |
| Male | 28,640 | (86%) |  | 297 | (88%) |
| Female | 4,494 | (14%) |  | 42 | (12%) |
| Planta |  |  |  |  |  |
| Plant 1 | 7,273 | (22%) |  | 70 | (21%) |
| Plant 2 | 14,251 | (43%) |  | 137 | (40%) |
| Plant 3 | 11,610 | (35%) |  | 132 | (39%) |
| Ever exposed to MWFsb |  |  |  |  |  |
| Soluble | 29,010 | (88%) |  | 299 | (88%) |
| Straight | 18,710 | (56%) |  | 197 | (58%) |
| Synthetic | 11,824 | (36%) |  | 111 | (33%) |
| Year of birth | 1941 | (1927, 1950) |  | 1935 | (1926, 1945) |
| Year of hire | 1967 | (1953, 1976) |  | 1964 | (1953, 1971) |
| Age at hire (years) | 23.6 | (20.0, 30.3) |  | 25.3 | (20.2, 32.9) |
| Age at leaving work (years) | 45.2 | (31.8, 57.3) |  | 53.0 | (36.4, 60.4) |
| Years at work | 15.2 | (7.0, 26.6) |  | 21.0 | (7.8, 29.9) |
| Year of death | 2001 | (1994, 2009) |  | 2004 | (1998, 2010) |
| Age at death (years) | 73.4 | (64.4, 81.3) |  | 73.0 | (66.3, 80.8) |
| Cumulative exposure to MWF (mg/m3-years)d | | | | | |
| Soluble | 4.33 | (1.71, 10.69) |  | 5.43 | (2.19, 14.33) |
| Straight | 0.67 | (0.21, 2.38) |  | 0.77 | (0.18, 3.52) |
| Synthetic | 0.44 | (0.15, 1.58) |  | 0.69 | (0.18, 1.91) |
| NHL: non-Hodgkin lymphoma. | | | | | |
| a Plant of longest employment duration among those who worked at multiple plants; b Lagged 20 years; d Among ever-exposed individuals, lagged 20 years.; | | | | | |

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| Figure 2. Median annual average daily exposure to soluble, straight, and synthetic metalworking fluids among exposed workers over time. |

The observed number of NHL cases over the 30-year follow-up period was 339. Table 2 presents estimates of the counterfactual number of cases, number of cases averted, and cumulative incidence ratios contrasting supportable interventions on exposure to soluble MWF based on different target exposure limits and no censoring. Under an intervention eliminating censoring, the estimated number of cases was 502 (95% CI: 439, 555). Interventions based on stronger target exposure limits on soluble MWF resulted in monotonically stronger reductions in the estimated cumulative incidence of NHL. Setting the target exposure limit at the NIOSH REL 0.5 mg/m3 would have averted 112 (95% CI: 57, 181) NHL cases.

**Table 2:** Estimates of the counterfactual number of cases, number of cases averted and cumulative incidence ratios contrasting supportable interventions on annual average daily exposure to soluble MWF to no intervention on exposure.

| Target exposure limit (mg/m3) | Cases | (95% CI) | Cases averted | (95% CI) | CIR | (95% CI) |
| --- | --- | --- | --- | --- | --- | --- |
| None | 502 | (439, 555) |  |  |  |  |
| 2.0 | 404 | (324, 468) | 98 | (45, 161) | 0.80 | (0.68, 0.91) |
| 1.0 | 396 | (316, 463) | 106 | (51, 173) | 0.79 | (0.66, 0.89) |
| 0.5 | 390 | (311, 459) | 112 | (57, 181) | 0.78 | (0.64, 0.88) |
| 0.25 | 384 | (303, 455) | 118 | (59, 192) | 0.77 | (0.62, 0.87) |
| 0.05 | 373 | (286, 451) | 129 | (66, 214) | 0.74 | (0.58, 0.86) |
| CIR: cumulative incidence ratio. MWF: metalworking fluid | | | | | | |

# Discussion

Although NIOSH concluded that there exists substantial evidence linking MWF exposure to several different cancers including larynx, rectum, pancreas, skin, scrotum, and bladder cancer, their REL of 0.5 mg/m3 for total particulate mass derived from any type of MWF was based on nonmalignant respiratory health effects.21,32 Exposure limits stronger than the NIOSH REL may provide valuable health protections not previously taken into account by policy makers. Using the hazard-extended ICE parametric g-formula, we estimated the counterfactual expected number of NHL cases from 1985 to 2015 in the UAW-GM cohort if we enforced hypothetical supportable interventions on soluble MWF based on five different target exposure limits and found a monotonic exposure-dependent relationship where stronger target exposure limits yielded lower NHL case count estimates.

The g-formula is a well-known approach in causal inference used for estimating causal effects in the presence of time-varying confounding affected by past exposure.16 Standard representations of the g-formula include (1) a non-iterated expectation over the joint density of covariates, (2) the ICE over time, and (3) an inverse probability weighted expectation. The classic parametric g-formula is a plug-in estimator for the g-formula under its first, non-iterative, representation. It involves the parametric modeling of the full joint distribution of the confounders, exposure, and outcome for each time point.17,33 Counterfactual quantities under hypothetical interventions of interest are computed from Monte Carlo samples from distributions implied by the fitted parametric models. In longitudinal settings, this approach often requires specifying and fitting large number of models in order to satisfy the exchangeability assumptions necessary for causal identification. Despite this limitation, analysts often choose the parametric g-formula because of the intuitive way it handles interventions on the natural value of exposure. However, these causal estimands are not unique to the parametric g-formula. The distribution of exposure produced by marginalizing intervention rules over the observed distribution of exposure within strata formed by potential confounder and exposure histories defines a corresponding stochastic dynamic intervention, whose effects may be estimated using various estimators.20,34–37 Estimating causal effects of this implied stochastic dynamic intervention is analogous to that of interventions on the natural value of exposure.33

Estimators using the ICE representation of the g-formula are capable of estimating effects of stochastic dynamic interventions. These ICE g-formula estimators require modeling only the conditional distributions of the outcome at each time. Hence, they require fewer parametric assumptions than the classic parametric g-formula. Counterfactual outcome estimates over the follow-up period are computed from interval-specific conditional estimates by applying the tower rule of expectation. Under the assumptions of conditional exchangeability at all time points, positivity, counterfactual consistency, and correct model specification, the hazard-extended parametric g-formula yields unbiased estimates of counterfactual risk with greater statistical efficiency than both propensity score-based estimators and the non-extended ICE g-formula.

Correct model specification is a standard assumption in all parametric and semi-parametric analyses. In causal analyses of longitudinal cohort studies, ICE g-formula estimators are less common than the classic parametric g-formula.38 However, a major limitation of the classic g-formula is the g-null paradox: the guaranteed misspecification of parametric models resulting in the false rejection of the null hypothesis when the null is true and when there is time-varying confounding affected by past exposure.39,40 As with all ICE g-formula estimators, the estimator we applied is not subject to the g-null paradox. Furthermore, since ICE g-formula estimators require fewer parametric modeling requirements than the classic parametric g-formula, correct model specification may be achieved more readily.

The consistency assumption, also known as the no-multiple-versions-of-treatment or stable unit treatment value assumption, is that counterfactual outcomes under each possible exposure value take on a unique value.41,42 This assumption would be violated if there were multiple versions of treatment causally associated with different outcomes. This basic notion of consistency is violated in our analysis because our exposure of interest is a complex mixture of diverse components with substantial variation over time due to changes in formulation as well as the natural physical, chemical, and biological changes in the MWF over the course of its use and reuse.43 However, causal effect estimates under violations in the consistency assumption are still valid and unbiased if there is adequate adjustment for confounders of the exposure-version relationship.42 This may be thought of as conditional consistency within strata, in which there is only one version of treatment. Our analysis indexed time periods over calendar time and adjusted for age, year of hire, and plant. In this way, we limited potential for bias due to variation in MWF composition.

Positivity refers to the need for adequate variation in future exposure among strata formed by observed covariate and intervention-compliant exposure histories. Even under conditional exchangeability, where exposures within these strata may be considered the result of experimental assignment, expected counterfactual outcomes under different exposures may not be estimable if there is excessive sparsity in the observed distribution of exposures.44 Rather than address potential violations in positivity analytically, we investigated stochastic dynamic interventions on soluble MWF exposure based on intervention distributions which are nonzero only where the propensity score is strictly positive. Hence, our supportable interventions guarantee positivity. Interventions that guarantee positivity have been suggested in the past and have also been called “realistic” interventions.19

Conditional exchangeability means that for all time points, there is no confounding of the relationship between exposure/censoring and both future exposure/censoring and NHL status given the observed past, including past exposure and confounders.18,37 A major threat to conditional exchangeability in longitudinal occupational studies is the HWSE. We limit potential bias due to the HWSE by conditioning on cumulative exposure, employment status, and cumulative time off history at each time point. Cumulative time off and employment status are reasonable mediators of the causal paths linking past health to future exposure and health, but adjustment for these variables may not be sufficient for eliminating bias due to the HWSE. Declines in a worker’s health may lead to reductions in work-related exposure without affecting employment status or time off work.45 We expect the absence of time-varying measures of worker health over the life course to result in bias toward the null.

Much of the existing epidemiologic literature linking occupational and environmental exposures to NHL report findings from case-control studies where exposures are measured as binary indicators of exposure or as membership in a particular occupational group.46–49 Associations between occupations and NHL risk vary considerably, but one study of working men in Kansas and Nebraska found strong associations between NHL risk and occupations involving metalworking and motor vehicles.50 Both of these occupations may entail exposure to soluble MWF, which contain mineral oils and a number of chemical additives of concern for human health and for NHL risk in particular. Organic compounds containing phosphorous, chlorine, sulfur, nitrogen, and boron are commonly added to soluble MWF to control microbial growth, improve performance under high heat/pressure, and inhibit corrosion.51 Organophosphorus compounds include organophosphate pesticides, which have been linked to cancer risk in epidemiologic and animal studies. Some were classified as possibly carcinogenic by the IARC.52 Studies of occupational exposure to chlorinated solvents and pesticides have also been linked to NHL risk.53–57 In 2014, the IARC classified trichloroethylene, tetrachloroethylene, and other chlorinated agents as Group 1 carcinogens.58 Chlorinated solvents are commonly used as degreasers in industrial settings, but their use in the plants under study here was rare.59 The structural characteristics shared by MWF additives and known/suspected carcinogens suggest potential similarities in their behavior in biological systems.

This study investigated the effect of supportable interventions on MWF exposure with guaranteed positivity. We compared the standardized risk of NHL under post-intervention distributions of exposure based on a range of target limits on annual average daily exposure to soluble MWF. We selected a range of hypothetical target exposure limits near the NIOSH REL of 0.5 mg/m3.21 If the target exposure limits were enforced uniformly rather than in a data-supportable way, we would expect even larger reductions in NHL risk relative to no intervention on exposure. The supportable interventions we evaluated here provide a more conservative estimate of the potential health benefit of enforcing stronger limits on MWF exposure in the real world because they explicitly restrict the causal contrasts to those supported by the observed data.

# Conclusions

Associations between several occupations and risk of NHL have been reported previously, but none to our knowledge evaluated the potential effect of realistic limits on occupational exposures.2,4,49,57 We found evidence that limiting exposure to soluble MWF would reduce NHL incidence in an analysis that guarantees positivity and adjusts for time-varying confounding affected by past exposure.

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