

The original documents are located in Box 5, folder “Environmental Protection Agency - Pesticides” of the Norman Ross Files, 1974-75 at the Gerald R. Ford Presidential Library.

Copyright Notice

The copyright law of the United States (Title 17, United States Code) governs the making of photocopies or other reproductions of copyrighted material. Norman E. Ross, Jr. donated to the United States of America his copyrights in all of his unpublished writings in National Archives collections. Works prepared by U.S. Government employees as part of their official duties are in the public domain. The copyrights to materials written by other individuals or organizations are presumed to remain with them. If you think any of the information displayed in the PDF is subject to a valid copyright claim, please contact the Gerald R. Ford Presidential Library.

file



Environmental News

November 1974

A surtax on automobiles weighing more than 3,000 pounds would help ensure energy conservation, John R. Quarles Jr., EPA Deputy Administrator, said recently. Quarles said that, in his "own judgment", the surtax should go as high as \$1,000 on large luxury cars weighing more than 5,500 pounds.

Quarles also said:

"If we are honest as to the prospects for expanding energy supply and if we are serious as to the hopes of reducing imports of oil, then we have no choice but to achieve major cuts in consumption through energy conservation. There is no other way."

--"Our future welfare demands that we look hard at the price we must pay because we have failed to keep under control our national addiction to high energy use. The time has come when we have got to kick the energy habit. In the past we have always met problems of shortages by reaching out for more production. We have never really tried to scale down the demand."

--"We should continue to consider the need for additional gasoline taxes or some form of rationing to cut down on excessive automobile use. We should abolish the Highway Trust Fund, so that Federal money for highway construction would go through the normal appropriations scrutiny. We should increase governmental support for public transportation."

--"...unless the automakers give a full and firm assurance that they will meet the President's request to improve fuel economy, we should adopt a flat regulatory requirement that all cars produced after 1978 achieve at least a minimum standard for fuel economy..."

Quarles addressed the Coal and the Environment Conference in Louisville, Kentucky, on October 22, 1974. His speech is attached for your information and use.



"Speeding Past the Danger Signs,

The American Joy Ride Rolls On"

It has been a year now since the term "energy crisis" burst into our vocabulary. To most of us it meant sitting in a line for gasoline and hoping that we would make it to the pump. To some of us it meant "dialing down" the heat in our homes and a hefty increase in our electric bills. But with the spring came the thaw. Gasoline was once more plentiful--no more lines and fearful waits. We turned off the heat and enjoyed the sunshine. Our electric bills were still high and prices of everything else seemed on the increase, too, but it was great to climb into the car once more and let the engine roar. We were back to normal again. The energy crisis was over.

I wish that it were so, but it is not. The Arab oil embargo was lifted, but we still face a snarl of critical energy problems. H. G. Wells once wrote that "the crisis of today is the joke of tomorrow." I would like to think he might be right, but I cannot believe that it will happen in this case.

The general public isn't worried over our lifeline of energy supply. Many people think that the "energy crisis" of last winter was just a lot of bunk, cooked up by the big oil companies to raise their prices. These attitudes show up in a return to full-throttle energy consumption. Highway traffic has crept back up to 70 miles per hour. Ridership on the public transportation which had increased is now back

down to normal, and morning traffic jams are back to normal too. National levels of gasoline consumption and other forms of energy demand have escaped from the patterns of reduction of last winter and have once more resumed their skyward ascent. Our imports of oil are now higher than ever before in our history.

The cold reality is that our national energy problems are no hoax. These problems are large. They are complicated. And they are serious. They pose a fundamental, far-reaching and extremely dangerous threat to the future health of our economy and to the well being of all Americans.

During the decades of the 1950s and the 1960s our energy consumption grew by leaps and bounds. Development of rich deposits of oil and natural gas in this country and hitting the oil jackpot in the Middle East held down the prices of all forms of energy, and this country went wild in its use of abundant, cheap power.

Today we confront a sobering set of different facts. We have badly depleted our best sources of oil and natural gas. Domestic production of oil has declined in the last few years and natural gas production also has peaked and leveled off. Our coal industry has been sadly weakened. In the last few years our ability to expand production of energy has fallen far short of our rapaciously growing demand. This has caused a widening gap between demand and supply, which has been met by skyrocketing imports of oil. From 1970 to 1973 our imports

of oil jumped from 3 to 6 million barrels per day.

Our increasing dependence on foreign oil has left this country with its soft underbelly exposed to danger. That danger became acute during the Arab embargo. We do not today have an ability to withstand a cutoff of foreign oil without shattering consequences rippling throughout our economic and social structure. Perhaps even more insidious is the impact of this dependence on our balance of payments. Since 1970 our payments for imports of oil have jumped from an annual rate of less than 4 billion to more than 25 billion.

The Arab oil embargo and subsequent price increases have brought this problem to a head. Virtually all projections had previously indicated that our imports of oil would continue to grow dramatically throughout the 1970s. Those projections were based on a recognition that domestic sources of energy could not possibly grow fast enough to keep pace with future growth in consumption. Today we recognize that we cannot tolerate the prospect of even heavier dependence on imported oil. Its threat is too great--both to our national security, and to our economic health. The question is what can we do about it.

We are caught in a triangle of excessive growth in demand, insufficient growth in production, and unacceptable levels of imports. There are many possibilities as to how the future might unfold, but all conceivable resolutions involve these three basic factors: consumption, production and imports. We

face a basic equation:

Consumption minus Production equals Imports.

Whatever happens, we will not be able to escape the clutches of that equation. We had better face it squarely and understand its implications.

First, let's look at imports. In the past our level of imports has fluctuated in response to the difference between domestic demand and domestic supply. As our domestic gap widened we simply increased our imports. With typical American assurance we ordered what we "needed" and assumed we could afford to pay the bill. There are today no legal restraints on the level of imports, but it clearly will undermine our national interest if we allow imports to continue to rise. No one disputes that our goal must be to reduce imports. This means that we must either increase production, or reduce consumption; or achieve a sufficient combination of the two.

Next, I will turn to production. Our national policy today places a tremendous emphasis on expanding energy supply. For the immediate future this means focusing on oil, coal, natural gas and nuclear power. No other energy sources can contribute any significant help between now and 1980 (or probably even 1985). Only in the more distant future can other sources such as oil shale or geothermal steam become significant. Short-term relief must come from traditional--not exotic--resources. It is urgent that we make every effort necessary to expand production in these areas. In

confronting this task we face immense obstacles.

Since our best and richest reserves of oil and natural gas have seen their better days, we are now forced to find new fields. Much of the new oil must come from Alaska's North Slope, where development incurs enormous cost as a result of the distant location and savage climatic conditions. Other major sources of oil and gas products must be found offshore, in areas where the extent of oil deposits is highly speculative and where again costs are magnified by the ocean depths. Expansion of onshore production often requires costly extra efforts to increase recovery from depleted fields.

Expansion of coal production faces all sorts of problems. Funding to open new mines has been scarce. Labor conditions are uncertain. Manpower and equipment are both in short supply. The scope of the task is almost overwhelming. Some proposals to transport Western coal to Eastern power plants will require entire new systems of transportation. Major production from new coal fields in the West will also require whole new towns to be built--complete with schools, hospitals, road systems, sewage facilities and other local services. These will take time.

Severe lead-time requirements afflict every field of resource development. Alaskan oil is not expected to arrive until after 1978. Other new fields will be later. New coal mines, oil refineries and other facilities all take at least three to five years to construct--and often

more. Lead times are most severe with respect to nuclear power. It now takes a minimum of roughly 8 years from initial planning to put a new nuclear power plant into operation. It is therefore already too late to increase the number of new plants that will come into operation during the 1970s.

What all this means is that we simply cannot expand energy production in a big way overnight. There is no magic button. Increasing production is a complicated, tedious, one-step-at-a-time operation, and it is going to take years to accomplish. Moreover, we are fighting the trend of an increasing gap between supply and demand, aggravated by declining production of domestic oil. In 1972 our oil fields at home produced 9.5 million barrels of oil per day. In 1973 they dropped to 9.25 million barrels per day. In 1974 they have averaged under 9 million barrels per day, even with every incentive to expand. It will take a vast effort merely to reverse this trend and to stay even with our increasing energy consumption, let alone to narrow the gap.

Even if it were possible to wave aside all the limitations of available manpower, and of available equipment, and all the technical difficulties, legal complexities, environmental objections, labor problems and governmental restraints--even then, it is awesome to consider the staggering magnitude of the effort required. If we are in fact to expand domestic

energy production to meet the projected growth in demand, an immense capital investment would be necessary. The National Academy of Engineering recently projected that the costs of these efforts between now and 1985 to expand energy production would reach the range of \$600 billion. The implications of such projects boggle the mind.

It seems almost unbelievable that enough capital could be raised to cover such expenditures. But even if we can raise the money, is it desirable to spend it in that way? Such an approach would require a priority for energy production over nearly every other economic activity or social need. It would require a single-minded mobilization of our resources as though we were at war. And it would commit us to a policy of rapidly consuming our finite resources of fossil fuels, with no clear alternative of where we turn once they are largely gone.

In the more distant future other energy sources may offer relief. Then again, they may not. The leading pilot project in oil shale was recently scrapped for a variety of reasons, including the fact that its costs had shot through the roof. The nuclear power breeder reactor program is also encountering problems and facing far greater costs than first projected. The future offers no easy panacea. Such exotic sources as solar heat and geothermal steam may have a role to play, but they will never solve our problem--at least not in this 20th Century.

Expansion of energy production and use will also take its toll on environmental values. Strip mining will leave its scars. Higher oil consumption probably means more oil spilled, and environmental damage from offshore development programs is unclear, especially in the uncharted areas. More use of high sulfur coal means more sulfur oxides going into the air, and since installation of desulfurization equipment is not likely to progress as rapidly as consumption of coal, the current impacts on public health will probably be further aggravated.

The secondary effects of energy production and all the supporting construction projects will have an even greater impact. More transmission lines, refineries, transportation terminals, processing plants and all types of other industrial facilities will be jammed onto our crowded landscape. There will be profits for some on each of the contracts, but what about the aggregate effect? What will all that steel and concrete really do for the quality of life of people? Is it really what we need, or want?

Despite these environmental concerns EPA has supported the national policy to expand with urgency our domestic energy production. We can see the overriding national interest in reducing our dependence on foreign sources of supply. Our country has worked its way into such a deep hole that we must pay a high price to get out. And we must get out. But it is one thing to recognize that a sacrifice must be made to avert a national disaster, and it is quite different for society deliberately to go forward repeating past practices to recreate for the future the same conditions that have put

us in the hole at the present.

We must not perpetuate the patterns of waste and extravagant consumption of energy that have caused an untenable dependence on foreign oil. When it gets to a boiling crisis, we may have to grasp out for more energy at almost any environmental and social cost. But what makes us get into such a crisis? Our future welfare demands that we look hard at the price we must pay because we have failed to keep under control our national addiction to high energy use. The time has come when we have got to kick the energy habit.

With these thoughts in mind let us turn to the third factor in the equation: controlling the growth of energy demand. The harder we look at the alternatives the more we are forced to fall back on the choice of energy conservation. If we are honest as to the prospects for expanding energy supply, and if we are serious as to the hopes of reducing imports of oil, then we have no choice but to achieve major cuts in consumption through energy conservation. There is no other way.

The stark truth is, however, that our society seems nowhere near being ready to make a real commitment to energy conservation. Many forms of energy use are being hammered down by higher prices, and this will help a great deal. Yet it will not do the job alone. Even with full allowance for the effect of higher prices, projections indicate continuous spiraling growth in virtually all categories of energy use.

In the national debate over our energy problems, energy conservation is a victim of lip-service concern. Nearly everyone agrees that to solve this national problem we need a combination of increased production and reduced consumption. We talk about increasing production. Many specific action programs are quickly described--increased coal leasing, increased offshore oil development, increased government research on all sorts of new energy sources, to name just a few. By contrast, after tipping one's hat to the general concept of energy conservation, few national leaders--even environmentalists--have much to offer in terms of specific proposals. The fact is that national opinion and government policy are moving forward with a variety of concrete efforts to meet the goal of increasing energy production, but that neither government policy nor national opinion has yet been ready to touch energy conservation with a ten-foot pole.

The root problem is public attitude. The public realizes the need to expand energy production, but the public has no real appreciation of the critical need to achieve energy conservation. Until we can obtain stronger public support for energy conservation, even bold proposals will fall on deaf ears. In the end Congress must set the national policy, and Congress will be responsive to prevailing public desires.

We must ask ourselves this question: Why are we being so slow on the uptake with energy conservation? I believe our problem is that we have two deep-seated hangups. First is a



failure to recognize that we must be willing to make some measure of sacrifice or at least adjustment in our patterns of daily life and consumption. Second is a failure to accept the need for firm governmental action to restrain the growth of energy demand.

Our history has ever been onward and upward. We always count on some technological breakthrough to get us over the next hurdle. It has worked in the past. Why change now? We do not like austerity measures, and in the absence of a calamity we are not likely to sign up for them.

Our problem is typified by the automobile. American car buyers have returned to the luxury dream boats. Projected sales of 1975 models indicate that their average weight will exceed that of the 1974 cars. The shift to smaller cars has petered out.

Tremendous progress could be achieved in energy conservation with very modest sacrifices in the field of automotive transportation. Many smaller cars on the road today give more than twice the gasoline mileage of their heavier cousins, and they meet the same safety and pollution control standards too. All we need to do is use the smaller cars, as Europeans have always done. We can also cut back on the great quantity of nonessential driving which is encouraged even today by gasoline prices far below the true value of the petroleum resources we are using up so recklessly.

We also need to make a real shift back toward a more balanced system of transportation in metropolitan areas by increasing public transportation. Despite this clear need,

we continue to pour money into the Highway Trust Fund and we continue not to match that money with adequate support for public transit systems. In the name of liberty for each person to drive his own car, we have condemned suburban commuters with no choice but to drive to work and we have left the poor and aged stranded in city ghettos with no access to the outside world.

To achieve the need for public understanding and support for energy conservation we must begin through appeals for cooperation and voluntary self-restraint. This is the essential first step. President Ford has undertaken this effort by asking all Americans to help cut down on energy use through a wide range of changes in their daily living habits. The President has also boldly challenged the nation's automakers to improve gasoline mileage by 40% to an average of 20 miles per gallon within four years, and he has indicated that he will seek legislation if needed to achieve greatly improved fuel economy. We must hope for a prompt and full response to these requests. We must also recognize the likelihood, however, that changes of the magnitude that are required cannot be accomplished by voluntary action alone.

If we are going to make a real impact to achieve energy conservation, certain fundamental changes must be made throughout our social and economic structure. Lip service and token gestures will not suffice. Patterns of industrial development and personal consumption have dynamics of their own. They move forward on their established courses with momentum and with force. Many existing market forces encourage waste. To

change these patterns--to truly hold back the flood--a public decision must be made and nailed down in firm legal terms.

My own judgment is that there is much that we can do and should do to ensure energy conservation--much that we can do without disrupting standards of living or imposing real hardship. For example, unless the automakers give a full and firm assurance that they will meet the President's request to improve fuel economy, we should adopt a flat regulatory requirement that all cars produced after 1978 achieve at least a minimum standard for fuel economy, and this bottom floor requirement should be coupled with a further incentive to shift toward smaller cars in the form of a surtax on all cars weighing more than 3,000 pounds escalated upward to as high as \$1,000 tax on the big luxury cars weighing over 5,500 pounds. We should also continue to consider the need for additional gasoline taxes or some form of rationing to cut down on excessive automobile use. We should abolish the Highway Trust Fund, so that Federal money for highway construction would go through the normal appropriations scrutiny. We should increase governmental support for public transportation. And we should establish measures along the patterns of the air pollution transportation control plans to reduce individual automotive use in metropolitan areas where public transportation can be provided.

None of these proposals would be popular. But such a package of governmental actions would reflect a judgment by society that a real change should be made. Short of commitments of this depth, success will not occur. I do not mean

to zero in only on the automobile. A great many similar changes should be made to deal with energy extravagance in other forms. But the automobile sits in the center of the stage in this drama of energy conservation. It is a big part of the problem in and of itself. And it is a symbol for all the rest. If we are unwilling to face up to the problem of the automobile and do something about it, we might as well forget about the goal of energy conservation. We are kidding ourselves if we think the job can be done without attacking the problem at its core.

The underlying issue posed by the energy crisis is whether a fundamentally new approach must be taken to cope successfully with this national problem. In the past we have always met problems of shortages by reaching out for more production. We have never really tried to scale down the demand.

Our whole American history has been a march against the frontier. We have set out to subdue the wilderness, to control our natural surroundings, and to exploit our natural resources. Progress and prosperity have been our slogans. GNP has been our yardstick of success. Constant increase of production has been the engine that has kept the whole show moving down the road. It has been the answer to every problem.

The basic division on this problem today is between those who see the future as an extension of the past and those who see the future as fundamentally different from the past. Many disturbing signposts indicate that we cannot keep going on our present course. We are pushing past the limits of our finite resource base. Problems are jumping up at us faster than we

can solve them, but we are keeping our foot pressed down on the throttle. We have breezed past the environmental crisis, and we are racing through the energy crisis. Our lights flicker. Our air smells foul. Our streets are choked with traffic. Our land is jammed with buildings. No matter. Full speed ahead.

A day will come when we shall rue our recklessness. A day will come when we shall look back in wonder that we didn't use more care. We are whizzing past so many opportunities to make small adjustments that would give us more time to find long-term solutions. In our heady self-assurance we cannot be troubled with such restraints. We may be heading for national disaster, but that isn't in our minds right now. In the meantime we are doing just fine. Speeding past the danger signs, the American Joy Ride rolls on.

WASHINGTON
OLD EXECUTIVE OFC BLDG, #28
DOMESTIC COUNCIL
ROSS, NORMAN R, JR
H 16 A



POSTAGE AND FEES PAID
ENVIRONMENTAL PROTECTION AGENCY
EPA-335
THIRD CLASS BULK RATE

OFFICE OF PUBLIC AFFAIRS (A-107)
U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

file
7/1

June 24, 1974

MEMORANDUM FOR MR. NORMAN ROSS *1/2*

This is a follow-up to our conversation regarding EPA's response to the GAO Report on Pesticides. At the time I spoke to you I was under the impression that the response would be initiated in a day or so.

Attached are copies of the "Environmental News" dated June 24, 1974, which I hope will be of interest.

If you have any further questions please don't hesitate to call.

Chuck

Charles L. Elkins
Acting Assistant Administrator
for Water and Hazardous Materials

Attachment

Mr. Norman Ross
Assistant Director
Domestic Council
The White House
Washington, D. C.



6/27



Environmental News

O'Neill (202) 755-0344

FOR IMMEDIATE RELEASE MONDAY, JUNE 24, 1974

EPA IMPROVES PESTICIDES PROGRAM IN LINE WITH GAO RECOMMENDATIONS

The Environmental Protection Agency has made major improvements in its pesticide regulatory program during the past year in line with the recommendations of a recent report by the General Accounting Office entitled "Pesticides: Actions needed to Protect the Consumer from Defective Products."

EPA undertook some of the improvements after having had the opportunity to review a draft of the report this past fall. Certain improvements in the enforcement area have been in effect as the result of an in-house investigation conducted by EPA at approximately the same time as the GAO study.

Among the improvements:

--Some 4,000 registered pesticides were sampled and tested by EPA for chemical composition and label accuracy between July 1973 and May 1974. This compares with 7,000 products sampled by the Federal government between 1968 and 1972. In addition, roughly 1,900 of the 3,500 U.S. firms producing pesticides had been visited by EPA inspectors as of May 1974.

(more)



--At the Port of New York, where approximately 60 percent of pesticide imports enter this country, EPA now has two full-time inspectors collecting samples. The Agency will increase its visits to the 291 U.S. ports of entry from an average of 50 in years past to about 250 this year.

--EPA has improved laboratory equipment for the chemical and biological analysis of pesticides at labs in Beltsville, Maryland and Bay St. Louis, Mississippi. The Bay St. Louis facility now routinely screens pesticide aerosols to determine if they contain the potentially hazardous gas, vinyl chloride. In addition, the EPA lab at Corvallis, Oregon, is expanding its biological test capabilities to study the environmental safety and effectiveness of insecticides, rodenticides and herbicides.

--Label statements for pesticides suspected of decomposing during storage will be addressed by EPA in registration regulations due to be proposed next month. Some chemical compounds including certain fungicides and the insecticides malathion, captan, carbaryl and DDVP have been tested by EPA for shelf life.

--During the past eleven months, 65 requests to manufacturers for recall of ineffective products and 101 stop sale orders were issued by EPA. In addition, between July 1973 and May 1974, the Agency initiated 420 civil and criminal pesticide actions primarily against producers or distributors for selling or shipping unregistered, adulterated, or mislabeled products.

--Establishments where pesticides are held for distribution or sale are notified by EPA when they are inspected and given a written notice stating the reason for the inspection. Afterward, the establishment is sent a copy of the completed sampling results with any deficiencies noted.

--Grants of \$50,000 each have been awarded by EPA to Hawaii and Washington State for cooperative pesticide enforcement programs. Additional State-EPA agreements are in various stages of completion for California, North Carolina, and Maine. The grants will vary according to local needs and capabilities, but combined the grants will involve State personnel in
1) collecting pesticide samples 2) chemically analyzing them
3) reviewing labels 4) developing a strategy to protect the

(more)

health of persons occupationally exposed to pesticides 5) preparing evidence for use in Federal enforcement actions.

The EPA pesticides budget for the coming fiscal year will be \$2.1 million greater than this current fiscal year's--\$32.9 million in fiscal 1975 as compared to \$30.8 million in fiscal 1974. This increase includes more funds for the re-registration of interstate pesticides, their classification into general or restricted uses, and registration of the roughly 12,000 pesticides sold intrastate. The increase also includes additional money for research on the health effects of pesticides.

#



16 A H
ROSS, NORMAN E, JR
DOMESTIC COUNCIL
OLD EXECUTIVE OFC BLDG, #28
WASHINGTON DC 20500



Environmental News

O'Neill (202) 755-0344
Fitzwater (202) 755-0344

FOR IMMEDIATE RELEASE FRIDAY, AUGUST 2, 1974

TRAIN INTENDS TO SUSPEND MANUFACTURE OF ALDRIN AND DIELDRIN

Environmental Protection Agency Administrator Russell E. Train today announced his intent to suspend the manufacture of the pesticides Aldrin and Dieldrin because they represent an "imminent hazard" to public health.

Train's suspension order becomes effective within five days unless the Shell Chemical Company, the sole manufacturer of Aldrin and Dieldrin, or any other registrant, request an expedited hearing on the order. If requested, the hearing would "take no longer than 15 days."

Today's suspension notice is designed to prevent the manufacture of an estimated 10 or more million pounds of Aldrin for anticipated 1975 use. The manufacturing process which would produce the Aldrin/Dieldrin products for sale and use in 1975 has been scheduled, according to Shell Chemical Company, to begin on September 1, 1974.

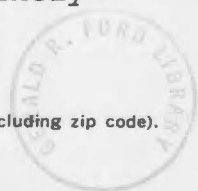
Train noted that he will permit the continued sale and use of existing supplies under a new provision in the recently amended pesticide control law.

"I find," Train said, "that a situation exists in which the continued manufacture of Aldrin and Dieldrin...will likely

(more)

Return this sheet if you do NOT wish to receive this material ☐, or if change of address is needed ☐ (indicate change, including zip code).

EPA FORM 1510-1 (REV. 8-72)



result in unreasonable adverse effects on man and the environment."

Train's suspension notice outlines the scientific and medical evidence supporting the "imminent hazard" ruling:

--Evidence presented at EPA hearings indicates that Dieldrin definitely causes significant increases of tumors in two different kinds of mice and two different kinds of rats. Many of these tumors have been diagnosed unequivocally as malignant by eminent pathologists. These tumors resulted from dosages as low as 0.1 part per million (ppm) in the diet. Cancer has been observed in test animals exposed to Dieldrin in the diet for as brief a period as only several weeks.

--For Fiscal Year 1973, the Food and Drug Administration reports measurable amounts of Dieldrin in composite samples of 83 percent of all dairy products, 88 percent of all garden fruits, 96 percent of all meat, fish and poultry samples, and from 12 to 42 percent in other food composites of grain and cereal products, potatoes, leafy vegetables, oils, fats and shortening, and fruit.

--Based on a national monitoring survey by EPA, human tissue samples taken during surgery or at autopsy revealed that in 1970, 96.5 percent of all individuals tested had detectable residues of Dieldrin in their fat tissues. In 1971, 99.5 percent of all those sampled had detectable amounts.

--Based on National Cancer Institute methods for estimating human cancer risk, the present average human daily dietary intake of Dieldrin subjects the human population to an unacceptably high cancer risk.

--Children, particularly infants from birth to one year of age, because of their high dairy product diets, consume considerably more Dieldrin on a body-weight basis than any other age segment of our population.

The Federal Insecticide, Fungicide, and Rodenticide Act authorizes the EPA Administrator to suspend a pesticide if he determines that it constitutes an imminent hazard to public health.

In the suspension order, Train notes the existence of alternative and environmentally preferable compounds.

(more)

"Thus," Train said, "affected corn farmers -- those who farm that 10 percent of the nation's acreage where Aldrin/Dieldrin has been used -- will have a means of pesticide control."

In permitting continued use of those already formulated, federally registered products containing Aldrin or Dieldrin, Train said:

"It is held by many of those who have investigated the potential risks and problems attendant to the disposal of consolidated stocks of some toxic materials, such as these pesticides, that it may well be safer environmentally to dispose of them through normal use patterns than to attempt to retrieve the product from the retailer or user, and then to transport, consolidate and either bury or burn remaining supplies.

"This latter alternative is what would be required at present with existing formulated stocks. Additionally, it is my understanding that corn farmers have already applied Aldrin this past spring, so that there remains only limited usage on minor crops during the remainder of the current growing seasons. Permitting use of existing stocks in these situations will not penalize farmers who have already purchased the compounds with the expectation of using them during the remainder of the growing season."

Aldrin and Dieldrin are closely related persistent or long-lived pesticides in the chlorinated hydrocarbon family. Aldrin breaks down into Dieldrin after application, but the latter chemical also is marketed separately. Aldrin is the more widely used of the two, with about 90 percent applied as a soil treatment to protect corn.

The EPA issued a notice of intent to cancel all Federal registrations of products containing these chemicals on March 18, 1971. Following a scientific advisory committee review of the subject completed in March 1972, the Agency confirmed cancellation of most uses but permitted retention of limited Aldrin/Dieldrin uses for termite control, nursery dipping of roots and tops of nonfood plants, and moth proofing of woolen textiles and carpets where there is no effluent discharge.

The EPA Administrator, in his 1971 order, did not suspend the manufacture of Aldrin/Dieldrin because it could not be

(more)

determined that an imminent health hazard existed. Most of the imminent health hazard data relied upon in today's action has been developed since that time.

Cancellation hearings on the March 1971 order began in August 1973 and are still in progress.

#

HENRY M. JACKSON, WASH., CHAIRMAN
ALAN BIBLE, NEV.
FRANK CHURCH, IDAHO
LEE METCALF, MONT.
J. BENNETT JOHNSTON, JR., LA.
JAMES ABUREZK, S. DAK.
FLOYD K. HASKELL, COLO.
GAYLORD NELSON, WIS.
HOWARD M. METZENBAUM, OHIO
PAUL J. FANNIN, ARIZ.
CLIFFORD P. HANSEN, WYO.
MARK O. HATFIELD, OREG.
JAMES L. BUCKLEY, N.Y.
JAMES A. MC CLURE, IDAHO
GEORGE F. BARTLETT, OKLA.

JERRY T. VERKLER, STAFF DIRECTOR

United States Senate

COMMITTEE ON
INTERIOR AND INSULAR AFFAIRS
WASHINGTON, D.C. 20510

file
EPA - Pesticides

AUG 6 1974

August 6, 1974

Dear Colleague:

I would like to draw your attention to an activity of the U.S. Forest Service which has come under question by environmentalists, scientific experts, and concerned citizens throughout the country. The United States Forest Service has requested funds in this year's Interior Appropriations bill to apply herbicide 2,4,5-T in 61 National Forests in 23 States in this country.

As you may recall, 2,4,5-T was used in the U.S. military defoliant, Agent Orange, in Vietnam until scientific evidence about its harmful effects was discovered in 1969. In 1970, EPA cancelled all uses of 2,4,5-T around the home and garden, in recreational areas, and where water contamination could occur. EPA has further announced its intentions to reexamine the registration of 2,4,5-T for forest, pastureland, and rights of way use.

Scientists have continued to raise questions about the harmful effects of 2,4,5-T and its deadly contaminant, TCDD dioxin. Dioxin is the world's most lethal synthetic substance -- so lethal that only six parts of dioxin per ten billion parts (bodyweight) was lethal in laboratory tests on guinea pigs. There is significant evidence indicating that the TCDD dioxin contaminant in 2,4,5-T bio-magnifies. If so it could become a serious contaminant in the food chain.

The question remains what does this mean for the health and environment in areas -- like our National Forests -- where 2,4,5-T is used. The evidence is not yet conclusive and requires further research. But no one can state with



any degree of surety that using 2,4,5-T is safe. And until we are sure it is safe, we should not be releasing this substance into the environment.

The Environmental Protection Agency has pledged to conduct a full monitoring program and exhaustive scientific tests to ascertain what the dangers of 2,4,5-T are. Until the Environmental Protection Agency can develop adequate tests, then it seems to me the height of folly to have another arm of the government, the Forest Service, routinely spraying the National Forests.

The idea of using 2,4,5-T in the National Forests, which are a multiple use natural resource, is particularly questionable since there is a four year old ban on 2,4,5-T in recreation areas and hundreds of thousands of people enter the forests for purposes of recreation.

Sound public policy dictates restraining all use of potent and toxic agents such as 2,4,5-T until adequate safety tests are conducted. This policy should particularly apply to agencies of the U.S. government.

In this regard, it should be noted that the National Forests' planned use of 2,4,5-T in two National Forests in Wisconsin has been halted by the Federal Court of the Eastern District of Wisconsin. The Wisconsin State Department of Natural Resources claimed in court that the U.S. Forest Service had not prepared an adequate environmental impact statement; this claim may well have validity in the cases of 59 other operations planned in the 23 states where the U.S. Forest Service is requesting appropriations in this bill to spray 2,4,5-T.

On Wednesday, when the Interior Appropriations Bill (H.R. 16027) will be considered on the Senate floor, I intend to offer the following amendment:
"none of the funds appropriated by this act shall be used for the purpose of applying the herbicide 2,4,5-T in any land within the United States National Forest System."

Should you be interested in cosponsoring this measure, please have a member of your staff contact Paula Stern (55323).

Sincerely,



GAYLORD NELSON
United States Senator

GN:cra

