

Train

- PAUL J. CANNEY, MD.
- CLYDE W. KENNEDY, MD.
- NORMAN D. BATHFIELD, MD.
- JAMES L. BURGLEY, MD.
- JAMES A. McCLUNG, MD.
- DEWY F. BARTLETT, MD.

United States Senate

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

please file

June 26, 1974

Russell E. Train, Administrator
 Environmental Protection Agency
 Waterside Mall
 401 M Street, S.W.
 Washington, D.C. 20460

Dear Mr. Train:

In light of this week's announcement that the Environmental Protection Agency is withdrawing formal hearings on the cancellation of certain uses of the herbicide 2,4,5-T, I would like to request a complete explanation of your agency's future research plans concerning 2,4,5-T.

Concerned citizens in this nation are looking to the Environmental Protection Agency for guidance on the use of this herbicide, which has come under such extreme scrutiny the past few years. Four years ago, EPA cancelled all uses of 2,4,5-T around the home and garden, in recreation areas, and where water contamination could occur. As for the remaining uses -- on rice, rangeland, and rights of way -- your agency has conceded that it does not have enough data to "assess the potential hazards associated with the use of 2,4,5-T."

The people of my state, Wisconsin, are experiencing the difficulties of a dilemma in which some uses are cancelled while other uses are legally permitted. Wisconsin citizens are debating the wisdom of a United States Department of Agriculture Forest Service plan to spray 2,4,5-T in two national forests -- the Chequamegon and Nicolet -- during the month of August. The USDA states that this practice is legal. Yet there is a ban on use of 2,4,5-T in recreation areas and during the summer tens of thousands of people enter the forest for purposes of recreation. There is an obvious inconsistency when spraying in forests is legal but spraying in recreation areas is not.

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EPA's legal decisions, of course, must rely on scientific evidence about the safety of 2,4,5-T and its contaminant dioxin, which happens to be the world's most toxic synthetic substance -- so toxic that only six parts per ten billion parts (bodyweight) is lethal in laboratory tests. The question remains in all of our minds what the laboratory tests mean for the health and environment in areas where 2,4,5-T is sprayed.

It seems to me that prudence dictates a ban on the use of 2,4,5-T in the National Forests pending adequate scientific tests. I would hope that you, Mr. Administrator, can assure me that EPA scientists are developing quality protocols of study towards this end. In the meantime, until the Environmental Protection Agency, an important arm of the U. S. government, can develop adequate tests, it seems to me the height of folly to have another arm of the U. S. government, the U. S. Forest Service, routinely spraying the U. S. National Forests.

There is a fundamental public policy issue at stake which, it seems to me, must be confronted head-on. The issue is this: Are we going to permit the widespread use of potent and toxic agents such as 2,4,5-T without requiring prior adequate scientific safety tests?

The answer can only be no. We must establish the safety of this -- and all chemicals -- before we release potentially hazardous products into the environment. As a matter of sound public policy, the use of 2,4,5-T for defoliation purposes in Wisconsin and all other states should be held up pending the conclusion of testing.

When appropriate scientific studies are concluded, it may well be that a safety level can be established. If such a safety level cannot be established, obviously it should not be used. In any event, it is absolutely essential for the Agency to detail what it plans to do about its admitted lack of vital information.

Sincerely,

GAYLORD NELSON
United States Senator

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