

MR. BRIAN LAMB, PRODUCER/DIRECTOR
C-SPAN

002594 MAY 17 93



ALBANY, NY 12206

3MAY93

BRIAN,
RE: DIOXIN / AGENT ORANGE / REED IRVINE & MY
CALL-IN REQUEST TO YOU (2 SEP 92, 3:40 PM APX)
FOLLOWING YOUR INTERVIEW SEGMENT WITH
REED IRVINE.

WOULD YOU PLEASE INVITE DR. [REDACTED] U.S.
EPA DIOXIN WHISTLEBLOWER TO C-SPAN TO DISCUSS
THE U.S. GOVT / INDUSTRY COVER-UP?

ALSO RICHARD CHRISTIAN (LT. COL. USA, RET),
AMERICAN LEGION AGENT ORANGE REP. WOULD BE AN
EXCELLENT COMPLEMENT TO DR. [REDACTED] HE IS THE
FORMER DIRECTOR OF THE PENTAGON'S JOINT SERVICES
ENVIRONMENTAL SUPPORT GROUP, THE AGENCY THAT
HELD THE VIETNAM WAR USAF RANCH HAND SPRAY
MISSION REPORTS, UNIT LOCATIONS, ETC. VITAL
CONGRESSIONAL TESTIMONY OF HIS WAS ALTERED BY
HIS SUPERIORS (SEE INCLOSURE). HE ALSO HAS EXTENSIVE
KNOWLEDGE OF THE GOVT. COVER-UP. THE AMERICAN
LEGION HAS SPENT SEVERAL HUNDRED THOUSANDS OF
DOLLARS ON INDEPENDENT STUDIES OF DIOXIN / AGENT ORANGE
AND VIETNAM VETERANS AND DESERVES SOME PUBLIC
RECOGNITION FOR ITS EFFORTS.

YOUR HELP IS GREATFULLY APPRECIATED BY ALL.

SINCERELY [REDACTED]

SPAN

REC'D FM [REDACTED] EPA
16 FEB 93 -AW

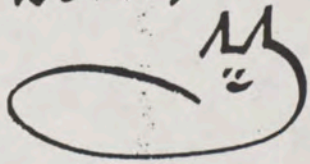
NOTE: RE: ABC-TV PRIME TIME
LIVE, 18 FEB 93: CATE JENKINS
HAS WORKED AT EPA FOR
14 YEARS. FOR THE PAST 3 YRS,
SHE WAS GIVEN ONLY 2 WEEKS
WORK (AT A SALARY OF \$59,000
PER YEAR) BECAUSE OF HER
WHISTLEBLOWING ACTIVITIES
ON EXPOSING MONSANTO'S
FRAUDULENT HUMAN HEALTH
STUDIES ON THE EFFECTS OF
DIOXIN. ON 14 DEC 92 A U.S.
DEPT. OF LABOR JUDGE UPHELD
A MAY 92 U.S.D.L. DECISION TO
REINSTATE HER AND ALSO UP-
HELD A \$10,000 EXEMPLARY
FINE AGAINST THE EPA AND
AWARDED TO DR. JENKINS.
-SHE IS REPRESENTED BY
THE GOVERNMENT ACCOUNT-
ABILITY PROJECT IN WASHING-
TON, D.C.

[REDACTED] - I've saved that
wonderful X'mas card you
sent!

Watch ABC

"Prime Time Live"
on Thursday night,
February 18. I
will be talking
about Monsanto
& being isolated
w/ no work.

REC'D FM [REDACTED] EPA
16 FEB 93 -AW



EPA DIOXIN REASSESSMENT
Status as of February, 1993

AGENT ORANGE

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies



ALBANY, NY 12206

PUBLIC AWARENESS

The New York Times

CENSORS/SUPPRESSES THE NEWS

RCVD FMC
16 FEB 93
-AW

U.S. EPA

The pulp and paper industry, whose effluents are contaminated with dioxin, sought to have EPA downgrade its potency estimate for dioxin. The industry pushed several "scientific theories" it wanted EPA to use. Industry held at least one documented meeting with John Sununu to force EPA to perform this reassessment.

Schedule and milestones: In the fall of 1991, and spring of 1992, EPA held two public meetings for public input into the reassessment. In August, 1992, a *Federal Register* notice announced the availability of nine draft chapters for public comment.² These chapters included human epidemiology, dose-response estimates, immunotoxicity, and reproductive toxicity.

The week of September 21, 1992, a public workshop meeting was held, where the authors of the chapters (outside consultants) and peer reviewers discussed their preliminary conclusions. As a result of this meeting, reporters such as Keith Schneider of the *New York Times* ran articles saying there was no dioxin threat. On October 19, Erich Bretthauer, EPA's Assistant Administrator for Research and Development, wrote a memo to dispel these misrepresentations in the press (see below).

The current schedule is to release a new set of draft chapters for public review this spring, incorporating comments on the first drafts. New expert panels of different scientists (but including the same chapter authors) will again be convened. Another public meeting with the new expert panels will be held.

A committee of the authors of the individual chapter will also be preparing an additional chapter, which characterizes the overall risk of dioxin.

A package of all the individual chapters, and the umbrella chapter on the overall risk assessment, will then be sent to EPA's Science Advisory Board (SAB) in July or August. (These dates have slipped in the past, and will probably slip again.) The SAB will then issue drafts and hold public meetings before making a final recommendation regarding dioxin to the EPA Administrator (Carol M. Browner).

Three written statements regarding dioxin from EPA are useful. The first comes from slides prepared for a February 14, 1992 (originally scheduled for January 27, 1992) briefing to EPA Administrator Wm. Reilly:

→ Dioxin does cause cancer in humans.

→ Cancer may not be the most sensitive toxic response resulting from dioxin exposure. Immunotoxicity and reproductive effects appear to occur at body burdens that are approximately 100 times lower than those associated with cancer.

→ Recent data indicate that there may not be a threshold for certain responses to dioxin.

¹ Opinions expressed herein are those of the author, and do not necessarily reflect those of the U.S. Environmental Protection Agency

² Copies of the draft chapters are available from the EPA ORD Publications Center, CERL-FRM, US EPA, 26 W. Martin Luther King Drive, Cincinnati, OH 45268; (513) 569-7562; fax (513) 569-7566. Copies of the draft chapters (and future drafts) are also available from the EPA contractor Eastern Research Group (Helen Murray); (617) 674-7307. Comments for the record should be addressed to the Office of Health and Environmental Assessment (RD 689), EPA, 401 M Street, SW, Washington, DC 20460, Attention: Dioxin Reassessment.

EPA also prepared a briefing booklet for Clinton's transition team which contained the following brief paragraph on dioxin:

Dioxin Reassessment. ORD is completing a scientific reassessment of dioxin which will be released in early 1993. This is likely to be an extremely controversial document as there are new findings indicating adverse reproductive effects at existing environmental levels.

Another statement is a memorandum from Erich Bretthauer, Assistant Administrator, to the EPA Administrator, dated October 19, 1992:

Certain non-cancer effects, including changes in endocrine function associated with reproductive function in animals and humans, behavioral effects in offspring of exposed animals, and changes in immune function in animals have been demonstrated. Some data suggest that these effects may be occurring in people at body burden levels that can result from exposures at, or near, current background.

Cancer: A The draft chapter for dioxin potency released to the public August, 1992 calculated cancer potency from tissue levels of dioxins found in two human studies, one by NIOSH and the other by a German manufacturer (BASF) on its employees. This human potency value was then compared to the Dow/Kociba rat data which has historically been the basis for EPA's dioxin potency level. The levels were similar.

The August, 1992 human epidemiology chapter stated that the CDC study on Vietnam veterans was "uninformative" since it lacked exposure information. The Ranch Hand studies were mentioned as being credible, but no Ranch Hand findings were included in the chapter..

Immunotoxicity: During the spring, 1992 public meeting, EPA made statements of how it intended to handle the immunological data, which indicated immunological changes in humans would occur before cancer. Chuck Elkins, EPA Associate General Counsel for the Cross-Media Analysis and Review Division announced that a policy team would decide how to handle the issue, since EPA thought merely showing a change in the immune system did not necessarily prove an adverse effect. A compromise of the immune system not shown to be as massive as seen in AIDS or other diseases was not being equated by EPA as an adverse effect. The important thing to note is that EPA was stating that immunotoxic effects were predicted to occur at lower doses than cancer..

The August 1992 draft chapter on dose-response relationships fails to give any dose level of concern for immunotoxic effects, thus avoiding the issue. The draft chapter stated that more research would need to be performed to enable calculating levels causing changes and/or adverse effects.

Reproductive effects: The draft chapter on reproductive effects released in August discussed in detail the mechanisms by which dioxin caused reproductive abnormalities in male and female animals, but did not address the question of the concentrations predicted to cause these effects in humans. The chapter yet to be written on the overall risk assessment of dioxin probably will contain a dose level predicted to cause reproductive abnormalities in humans.

The briefing book prepared by EPA for President Clinton's transition team (quoted at the beginning) referred to background concentrations causing reproductive effects in humans. Presumably, this refers to the animal studies demonstrating that in utero exposures of male fetuses caused life-long feminization, studies showing infant primates exposed to dioxin through their mothers exhibiting behavioral changes, and studies on humans demonstrating decreased sperm counts and lower testosterone levels.

NOTE: THIS HAS BEEN A COVER-UP BY BOTH POLITICAL PARTIES.
PRESIDENT CLINTON HAS A SEVERE CONFLICT OF INTEREST, IE:
DIOXIN CONTAMINATED MFG. PLANTS IN ARKANSAS, INCINERATOR PLANT, ETC.

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FEDERAL TIMES

RCVDFM
17 JUN 92
-AW



In the Law

EPA Told to Reinstate Scientist

Employee Transferred After Disputing Agency's Stand on Dioxin

By Meg Walker

disagreed when her agency classified dioxin, the main component of the defoliant Agent Orange, a "probable" cause of cancer.

a scientist at the Environmental Protection Agency, believed the dioxin rule should be tougher. She dug up data questioning the chemical company studies on which the classification was based.

Soon after, was reassigned out of her position developing regulations at the EPA's Office of Solid Wastes.

Now the EPA has been ordered to give her job back.

was a "protected employee engaging in a protected activity" and was discriminated against because of her activities, according to Travis M. Campbell, a district director with the Labor Department Employment Standards Administration wage and hour division.

"The evidence indicates that Ms. was reassigned from the listings branch as a result of the desire of management that she not work in a position where she might come in direct contact with the regulated community or the general public," Campbell wrote.

Campbell ordered reinstated and reimbursed for legal fees and costs.

was moved from her position last April after she alerted the EPA that it was relying on possibly fraudulent data to create policies about the use of dioxin, a probable carcinogen.

Dioxin was one of the main components of Agent Orange, a defoliant used during the Vietnam War. It also is contained in a variety of hazardous wastes.

was reassigned and told she could no longer work on policies related to hazardous wastes, according to her lawyer, Stephen Kohn.

Kohn filed a complaint on behalf with the Labor Department in April alleging that EPA's transfer of broke several environmental laws such as the Clean Air Act, the Safe Drinking Water Act and the Solid Waste Disposal

Act. The laws give employees whistleblower protection from reprisal.

"I am vindicated by this decision," said who has worked at EPA since 1979.

"As a federal employee, I was acting as responsibly as I can to protect human health and the environment. I knew EPA was not regulating dioxin in a stringent way."

Kohl said, "I think this decision sends a message that the EPA should be supporting its scientists even if they take a controversial position."

EPA officials declined to comment on the ruling.

problems began in 1990 when she was developing regulations on hazardous wastes. She was concerned about the fact that EPA had classified dioxin as a "probable" human carcinogen, meaning it caused cancer in animals but not in humans.

believed this policy was based on studies given to the EPA by Monsanto Chemical Corp., a company that produced Agent Orange during the Vietnam War.

Those studies, said showed one group of Monsanto workers exposed to dioxin had not developed cancer. But provided the EPA with scientific research and other information casting doubt on how Monsanto's studies had been done.

"I felt it was my job to make sure this information got to the right people in EPA," said. "Specific regulations on dioxin were ruled out because of a 'Monsanto legal threat.'"

"To me, this indicates Monsanto had had an extensive dialogue with my superiors to prevent me from working on any chemical manufacturing or waste handling activity," said.

Soon after she sent the information to EPA officials, said she was taken off projects that involved dioxin, or formulating regulations.

"I had been been retaliated against by being given non-entity jobs," she added.

EPA has 30 days to reinstate to her former position, according to the Labor Department ruling.

*EPA can appeal the ruling by asking for an administrative hearing before the Labor Department. That decision would be forwarded to the Labor secretary who can make a final ruling. If EPA is still dissatisfied, it can appeal to the U.S. Court of Appeals.

*NOTE: THE RULING WAS UPHOLD BY LABOR DEPT. JUDGE GLEN ROBERT LAWRENCE ON 14 DEC 92.

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

CONFLICT OF INTEREST???
No response as of:
THE TIMES UNION CENSORS/SUPPRESSES THE NEWS

PUBLIC AWARENESS

Dioxin in Lysol!

Albany, NY



92-CAA-6 DEC 14 1992

[REDACTED] Ph.D.
Complainant

v.

U.S. ENVIRONMENTAL PROTECTION
AGENCY

Respondent/APPELANT

2

AGENT ORANGECriminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

FINDINGS OF FACT AND CONCLUSIONS OF LAW

Findings of Fact

1. Attachment A (A) to this decision is a stipulation of facts by the parties. It is incorporated herein as findings of fact.

2. [REDACTED] holds a PH.D in organic chemistry and a General Schedule Grade (GS) 13 as an environmental scientist employed since 1979 by The Environmental Protection Agency (EPA). By her preference, since 1980 until March, 1992, she worked at detecting hazardous waste and developing regulations for their control (listings or listing regulations). She specialized in Dioxin (Agent Orange), a contaminant of wood preservatives and used in the Vietnam War as a defoliant. Her work involved both public and industry contact and required scientific research, sampling and analyzing specimens T17-21, 23, 61 A, C43, 5.

3. In 1980 Dr. [REDACTED] was employed by the Listing Section of The Waste Characterization Branch (WCB) of the Character Assessment Division of the EPA Office of Solid Waste (OSW). In 1988 WCB was moved to the Land Disposal Branch. Dr. [REDACTED] duties remained the same A.

4. In 1989 and 1990 Dr. [REDACTED] received cash awards for on the job performance. She was never criticized by her supervisors nor advised that she had violated any rule T25-27, 97.

5. With notice to her supervisors, the complainant from 1988 to 1990 wrote several times to Congress stating that EPA OSW had acted improperly T28-30, C9-11.

6. Monsanto Chemical Corporation was the largest producer of Agent Orange during the Vietnam War. Monsanto promulgated a scientific study claiming that Dioxin exposure as a causal agent for cancer was uncertain T31-32. Dr. [REDACTED] wrote the EPA Science Advisory Board (SAB) on February 23, 1990 that there was misinformation in the Monsanto study. SAB wrote Dr. [REDACTED] that her paper was sent to National Institute of Health and Safety (NIOSH). In 1991 NIOSH issued a paper saying the Monsanto study was invalid T34, C14.

7. Shortly after Dr. [REDACTED] memo to SAB, Edwin Abrams, Chief of The Listing Branch where the complainant was employed, issued a memorandum stating that Dr. [REDACTED] "should not be involved with anything that puts her in direct contact with the regulated community or the public" and that she should be placed in an administrative or staff position like Bill Sanjour, "a well known whistleblower at the EPA, and that "not worry about whether she is happy". Mr. Abrams told Mr. Bussard, the director of the division that he didn't want Dr. [REDACTED] in his section because she would look for Dioxins in absolutely every waste stream 53-54, 144-145 ;C12,13,26

8. The complainant's work load was reduced in the spring and summer of 1990 T41.

* (G) MONSANTO IS UNDER CRIMINAL INVESTIGATION FOR FRAUD BY EPA. EPA FORCED TO DO SO BY DR. [REDACTED] MEMO DTD 15 NOV 90. THE NIOSH STUDY DTD 24 JAN 91 (CAUSED BY DR. [REDACTED]) REFUTED THE FINDINGS OF THE KEY (MONSANTO) SCIENTIFIC STUDY CITED BY THE FEDERAL GOVT, ETC TO DENY THAT DIOXIN EXPOSURE IS HARMFUL TO HUMANS.

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

Albany, NY

PUBLIC AWARENESS

Dioxin in Lysol! THE TIMES UNION CENSORS/SUPPRESSES THE NEWS

U.S. Department of Labor

Office of Administrative Law Judges
800 K Street, N.W.
Washington, D.C. 20001-8002

92-CAA-6 DEC 14 1992



Ph.D.
Complainant
v.

U.S. ENVIRONMENTAL PROTECTION
AGENCY
Respondent/APPELANT

Recommended Order

AGENT ORANGE

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

The EPA is ordered to:

1. Reinstate the complainant Dr. [redacted] to her position as Environmental Scientist WO-1109 in the Listings Section
2. Not terminate, demote, involuntarily transfer or take other adverse action against the complainant unless good cause exists.
3. Pay all attorney fees and costs.
4. Post this decision and order prominently at all EPA job sites and circulate to all EPA employees.
5. Not take any future retaliatory action against Dr. [redacted]
6. Pay Dr. [redacted] \$10,000 exemplary damages.

Glenn R. Lawrence
Glenn Robert Lawrence
Administrative Law Judge

EPA can appeal the ruling by asking for an administrative hearing before the Labor Department. That decision would be forwarded to the Labor secretary who can make a final ruling. If EPA is still dissatisfied, it can appeal to the U.S. Court of Appeals.



Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

Albany, NY

PUBLIC AWARENESS

THE TIMES UNION CENSORS/SUPPRESSES THE NEWS
Dioxin in Lysol!

5

5

INTERNATIONAL
INDEPENDENT AGENT ORANGE NETWORK

PUBLIC AWARENESS
Dioxin in Lysol!

Albany, NY

THE TIMES UNION

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

CONFLICT OF INTEREST???
No response as of:

CENSORS/SUPPRESSES THE NEWS

NEWSDAY, TUESDAY, JANUARY 29, 1991

Company's Dioxin Studies Under Fire

By Carolyn Colwell
STAFF WRITER

A chemical company's studies showing that workers have not been seriously harmed by exposure to dioxin have come under fire by Greenpeace and new scrutiny by the U.S. Environmental Protection Agency.

The EPA has launched a criminal investigation of whether the dioxin studies by Monsanto Corp., a St. Louis-based chemical company, are fraudulent, according to an internal EPA memo. And the environmental organization Greenpeace has petitioned the EPA to reassess the validity of the studies and the agency's regulation of dioxin, which Greenpeace alleges has been adversely influenced by the Monsanto research.

The studies by Monsanto of workers at its Nitro, W.Va., plant have been relied on by the federal government to show that dioxin exposure has not been harmful to humans and does not require more stringent regulation or classification as a significant human carcinogen. The government and chemical companies have used the studies to discredit claims by Vietnam veterans that their exposure to the dioxin-contaminated herbicide Agent Orange has damaged their health.

A study published in a medical journal last week showed that chemical workers exposed to 500 times the normal amount of dioxin for at least a year are nearly 50 percent more likely to develop some kinds of cancer. The study, carried out by the National Insti-

tute for Occupational Safety and Health, suggested that lesser exposure is not dangerous.

A Monsanto spokesman in St. Louis said earlier this month the company welcomes the EPA investigation and called Greenpeace's allegation that the studies are flawed "a bald-faced lie" that the environmental group is using as part of its fund-raising drive.

Dan R. Bishop, Monsanto's director of corporate communications, said the company thinks the EPA investigation is "the only way to put the matter to rest." He added in a press release that, "The company stands by its findings, welcomes any legitimate scientific audit and is absolutely certain that its studies will continue to withstand legitimate scientific scrutiny."

In addition, Bishop said that before news of the EPA investigation first surfaced late last year, Monsanto had independently requested an EPA audit of its studies "to settle this matter for once and for all."

A spokesman for the EPA in Washington, D.C., Dwayne Winters, said earlier this month that he cannot confirm or deny that a criminal investigation is under way, but said the agency is studying the issues raised by Greenpeace's Nov. 29 petition. Winters said the agency will respond to the petition by Feb. 28.

*According to a memo from EPA chemist Dr. Cate Jenkins to the EPA's Office of Criminal Investigations in Denver, one of the key flaws in the Monsanto studies was the inclusion of exposed workers in the unexposed group and vice versa. Consequently, the incidence of cancers and other illnesses in the exposed

group would have been diluted by the inclusion of unexposed workers, Jenkins explained.

This issue was raised in a successful federal suit against Monsanto by workers at one of its plants in East St. Louis, Ill. Monsanto has appealed that verdict.

Greenpeace raised the same question in the critique of the Monsanto studies, which it appended to its petition. The critique was based on court documents and published research. "The Greenpeace analysis of several of the studies show that dozens of workers with cancer and heart disease, who were known to be exposed to dioxin, were inappropriately shifted into unexposed 'control' groups or excluded from the studies altogether," Greenpeace said in November.

Joe Thornton, author of the Greenpeace critique, said in a telephone interview this month: "We're relying on scientists who are paid and hired by the corporations who are producing these chemicals to formulate policies and these regulations... We really need to rethink our reliance on corporate-paid experts."

The Greenpeace petition also asks that the EPA not rely on the studies as part of its regulatory efforts or assessments of carcinogenic risk and that the agency establish a national dioxin-elimination program to control the release of dioxin into the environment. Under Section 21 of the Toxic Substances Control Act, the EPA has until Feb. 28 to answer the petition. "I can tell you that we take any Section 21 request rather seriously," Winters said. If the petition is denied, the petitioner can go to federal court for a hearing.

RE: DIOXIN 2,3,7,8-TCDD IN LYSOL HOUSEHOLD DISINFECTANTS, 2,4,-D LAWN & GARDEN HERBICIDES AND PENTA WOOD PRESERVATIVES. MONSANTO FALSIFIED WORKERS HEALTH RECORDS AND PUBLISHED FRAUDULENT STUDIES IN THE JOURNAL OF THE AMERICAN MEDICAL ASS'N, ETC.

August 17, 1990
Harry M. Rosenfeld, Editor
Times Union/Sunday Times Union (518)454-5420
P.O. Box 15000
Albany, NY 12212

New York State Agent Orange Victims Network
Agent Orange Petition Committee
C/O Andrew Wilkinson PH: (518) 462-2236

*NOTE: 1 DEC 90-MAILED TO DAN LYNCH (T.U.) [REDACTED] EPA MEMO DATED NOVEMBER 15, 1990, SUBJECT: Criminal Investigation of Monsanto Corporation - Cover-up of Dioxin Contamination in Products - Falsification of Dioxin Health Studies

Dear Mr. Rosenfeld,

How much longer will the local news media including the Capital District's leading (?) newspaper allow the U.S. Government/industry DIOXIN conspiracy/cover-up to exist?

On Feb 23, 1990, I mailed to you expose legal documents/correspondence: Plaintiff-Appellees' brief, IL No.5-88-0420 (extracts) filed Oct 3, 1989, App. Ct., 5th Dist., Illinois. RE: Kemner et al v. Monsanto, IL No. 80-L-970, etc. I mailed additional supporting information to managing editor Dan Lynch on Mar 26, 1990. I was disappointed (but not surprised) in not receiving any response from either of you, and I observed no improved coverage in the Times Union/Sun Times Union.

I hope you will favorably consider printing EPA scientist [REDACTED] whistle-blower article 'UNRAVELING THE EPA DIOXIN CONSPIRACY' (Pesticides and You-National Coalition Against the Misuse of Pesticides, June, 1990).

If you decline or hesitate printing [REDACTED] article, I would appreciate a letter of explanation from you, which I intend to share with interested parties, including the International Independent Agent Orange Network. Additionally, it would be very helpful if you could do a better job of providing a more thorough coverage and examination of this vital Public Health issue in the future.

P 066 438 323
RECEIPT FOR CERTIFIED MAIL
BY MAILING OFFICE
DATE (Required)
HARRY ROSENFELD, EDITOR
TIMES UNION/SUNDAY TIMES UNION
P.O. BOX 15000
ALBANY, NY 12212
90
320
NOT A RETURN RECEIPT
DATED 22 AUG 90-AW

CONFLICT OF INTEREST????
No response as of:

"Truth is not only violated by falsehood. It may be equally violated by silence."

-Amile-

(PLEASE COPY AND CIRCULATE)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

DATE: November 15, 1990

SUBJECT: Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health StudiesFROM: [REDACTED] Ph.D., Chemist
Regulatory Development Branch (OS 332)
Characterization and Assessment DivisionTO: John West, Special Agent in Charge
Office of Criminal Investigations
National Enforcement Investigations Center
U.S. Environmental Protection Agency
Building 53, Box 25227 (303) 236-5100
Denver, Colorado 80225

Kevin Guarino, Special Agent
Office of Criminal Investigations
National Enforcement Investigations Center, EPA

As per our meeting yesterday, I am summarizing information available to me supporting allegations of a long pattern of fraud by Monsanto Corporation. The fraud concerns 2,3,7,8-tetrachlorodibenzodioxin (dioxin) contamination of a wide range of Monsanto Corporation products, as well as health studies of Monsanto's dioxin-exposed workers. You indicated that you would contact me regarding the specific documents which would be useful to your investigation.

SIGNIFICANCE OF MONSANTO'S DIOXIN FRAUD

You stated that pursuing a criminal prosecution against Monsanto would require a prior determination of the significance of the fraud. In order for proceedings to be initiated by EPA, the fraud would need to have affected the regulatory process at EPA, and Monsanto would need to have knowingly submitted the falsified data and health studies to

Albany, NY
PUBLIC AWARENESS
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CONFLICT OF INTEREST??
No response as of:

RE: DIOXIN - MORE HAZARD THAN PREVIOUSLY THOUGHT (NEWSDAY, 6 OCT 92)

Albany, NY
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CONFLICT OF INTEREST??
No response as of:

DIOXIN



EPA workers search for dioxin by taking samples of silt following a flood in Times Beach, Mo.

DIOXIN
AGENT ORANGE
Criminal Investigation of Monsanto Corporation
Cover-up of Dioxin Contamination in Products
Falsification of Dioxin Health Studies

AP Photo

REAPPRAISAL FINDS TOXIC COMPOUND MIGHT BE A GREATER HAZARD THAN PREVIOUSLY REALIZED

NEWSDAY, TUESDAY, OCTOBER 6, 1992

By Earl Lane
WASHINGTON BUREAU

FEW INDUSTRIAL chemicals have drawn as much scientific attention as dioxin, often called the most toxic compound known to man.

In the past two decades, a cottage industry of researchers has tried to determine if the chemical causes cancer, sorting out the evidence from animal studies and from some highly publicized human exposures to dioxin.

But for all the attention and the hundreds of millions of dollars spent in dioxin cleanups, the evidence has remained decidedly mixed. Although Vietnam veterans exposed to the dioxin-tainted herbicide Agent Orange were eventually offered compensation, solid data on dioxin's cancer-causing

DISCOVERY

potential among the vets is elusive.

At Seveso, Italy, thousands were exposed when a chemical plant exploded in 1976, but the feared aftermath of cancers has not yet materialized. At Times Beach, Mo., 3,000 residents were evacuated in 1982 after dioxin-laced soils were found, but a federal official suggested the exodus — in retrospect — probably was unnecessary.

Given the political and scientific maelstrom that has swirled around dioxin for two decades, any new effort to assess its health hazards was bound to be controversial.

Yet, when an expert panel met recently to evaluate an eight-volume draft study on dioxin prepared for the U.S. Environmental Protection Agency, there was surprising agreement on several key issues:

- While stopping short of declaring

dioxin a "known" carcinogen in humans, the panel said preliminary review of several recent studies among dioxin-exposed workers "appears to support the position that [dioxin] increases cancer mortality of several types."

- Panel members urged EPA to look beyond dioxin's cancer-causing potential to new evidence that the chemical's potential health hazards may be broader and more troubling than generally recognized.

- While not resolving a long-standing debate on whether very small amounts of dioxin exposure may be essentially harmless, panel members said the evidence suggests that the chemical may trigger unpredictable molecular changes even at very low

Please see DIOXIN on Page 56

DIOXIN from Cover

levels of exposure.

"We don't know for sure what this chemical is doing at levels some people might be exposed to," said Curtis Klaassen, a University of Kansas toxicologist who headed the 14-member review panel.

The reappraisal of dioxin was ordered last year by EPA administrator William Reilly after industry officials — citing new research findings — said the chemical is less dangerous than previously believed. But the new research — with its insights on how dioxin works within cells — has proved to be a double-edged sword.

It has encouraged hopes for a new era of risk assessment in which scientists move beyond simply measuring the toxicity of various doses of a chemical on lab rats. Instead, a precise understanding of a chemical's action within the body might allow a much more focused assessment of its risks. Such "biological models" might allow scientists to say with more confidence the odds that a particular dose of dioxin will play havoc inside cells and eventually trigger disease.

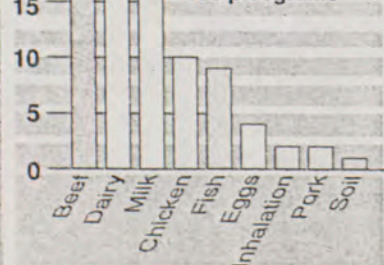
Ultimately, such models might be used by policymakers to help assess the risks of a whole range of dioxin-like chemicals, including some of the PCBs (polychlorinated biphenyls). The work might also open the door to similar assessment models for other toxic agents and chemicals, EPA officials said.

But the basic research on biological

Daily Dosages

How much exposure the average adult has to dioxin and dioxin-like chemicals in one day. Amounts are expressed in picograms, which is a trillionth of a gram.

Total exposure
125 picograms



models also has been giving scientists a wealth of new data on the subtle effects of dioxin in the body. The more they learn, the more complex the molecular picture is likely to become. Such data can make it more difficult for researchers to give clear-cut answers to policymakers asking just how dangerous a chemical is.

Recent studies have found, for example, that dioxin and dioxin-like chemicals can provoke a variety of biochemical changes in animals even at low doses. These can include a weakening of the immune system, reproductive problems and birth defects. Moreover, the panel heard evidence that some of dioxin's non-cancer effects can occur at levels of exposure at or near those experienced by the average person.

Given such concerns, the review panel members and other scientists attending a four-day meeting on dioxin's risks tended to urge caution in making any sweeping conclusions on the health risks of dioxin and its chemical relatives.

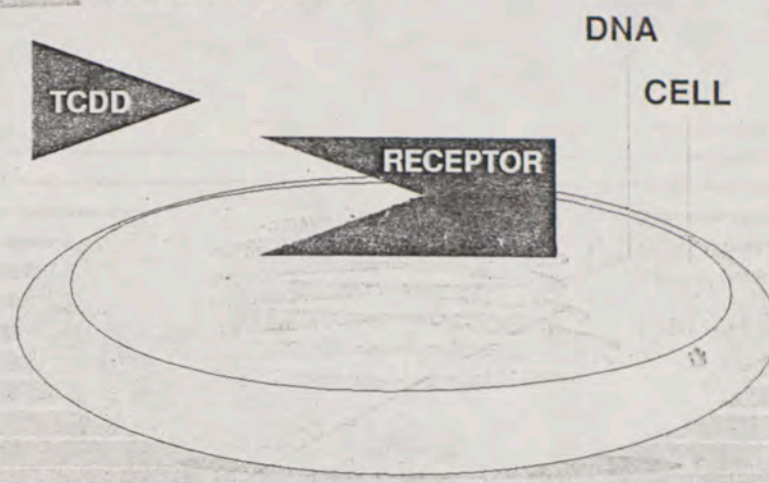
The scientific impetus for the current reappraisal of dioxin grew out of a meeting two years ago at Long Island's Cold Spring Harbor Laboratory. Scientists agreed then that dioxin appears to act like a hormone. Within cells, it binds to a specific site called the aromatic hydrocarbon (or Ah) receptor — like a key fitting into a lock.

The receptor and the dioxin molecule then attach to DNA — the genetic material — in the cell's nucleus, triggering the production of certain enzymes and other potentially hazardous products.

Some scientists argued that dioxin's effects are felt only after enough of the chemical locks onto thousands of receptor molecules. In this view, a small dose below a certain threshold is insufficient to cause a hazard. But there is evidence that some biochemical changes can be triggered when as few as 100 receptors are engaged, scientists said. The number may be even lower, but measurement techniques are not sensitive enough to detect it. EPA traditionally has regarded the chemical's impact as "linear" — that is, even a single dose has some untoward effects on body cells.

"Four or five years ago, I would say it's obvious there is a threshold" below which dioxin exposure has no impact, said Michael Gallo, professor of environmental medicine at the Robert Wood Johnson Medical School in Piscataway, N.J. But he said that for biochemical effects where the data are highly precise, dioxin's impact is "clearly linear."

TCDD enters the cell and binds to a intracellular receptor.



William Farland, director of EPA's Office of Health and Environmental Assessment, agreed. "Early measures of biological response appear to be linear as low as you can go," he said. But Farland added, "We've still got an area of uncertainty."

Pharmacologist James Whitlock Jr. of Stanford University argued that there are essentially harmless doses of dioxin. "To my way of thinking, there is a threshold," said Whitlock, one of the authors of the EPA draft study. "There is a safe level. One molecule of dioxin will not cause illness." But Whitlock said he does not know what the dangerous level might be. "It may be lower than we think," he said.

George Lucier of the National Institute of Environmental Sciences in Research Triangle Park, N.C., said dioxin is likely to have a range of responses, depending on the susceptibility of individuals. For certain fundamental biochemical changes, he said, "there is no reason to believe any threshold exists."

But just how these dioxin-triggered biochemical changes may relate to human cancer formation or other diseases remains unknown. The receptor-dioxin complex, once bound to DNA, can induce the production of an enzyme from the cytochrome P-450 family that can have both good and bad effects. The enzyme helps break down fats within the cell, but it also can lead to the formation of potentially dangerous compounds.

Some scientists on the panel said they need more information on the cascade of molecular events that dioxin triggers before attempting to use such biological models for risk assessment. That is particularly true for small doses.

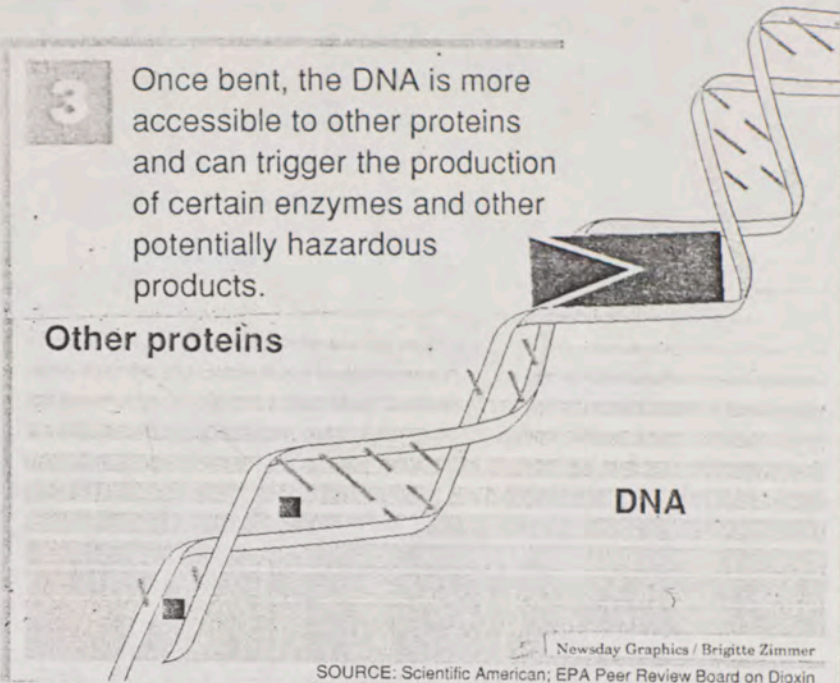
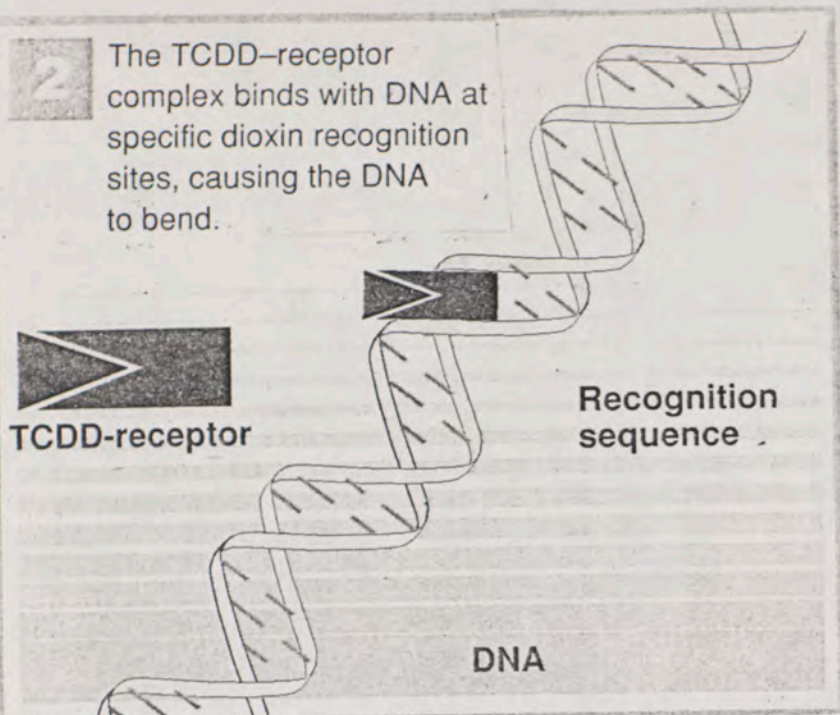
"We're taking these models as far as we can," Lucier said. "We may conclude, pragmatically, that you can't say if there is a safe dose."

EPA's Farland agreed. "I'm not sure we can reach conclusions about a single safe level" of dioxin exposure, he said.

But industry scientists said there is room for the EPA to revise its dioxin standards according to levels of acceptable risk. In their view, it is important to rank toxic compounds in some order of potential hazard.

"I'm not sure it's an either-or situation," said Joseph Rodricks of ENVIRON, a consulting company that is working with the American Paper Institute. Dioxin is a byproduct of paper bleaching. "There may be a range of very low exposures where there is no response or a minimal response," Rodricks said. At such levels, industry officials say, the costs of additional emissions controls on dioxin make little sense.

Scientists never have enough data to make themselves happy, panel chairman Klaassen acknowledged. But toward the end of the panel meeting, he pressed his colleagues to stick their necks out and of-



Newsday Graphics / Brigitte Zimmer

SOURCE: Scientific American; EPA Peer Review Board on Dioxin

Dioxin in the Body

There are 75 kinds of dioxin, but the most potent is 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (TCDD). This compound is created during combustion and as a contaminant in some chemical manufacturing processes.

Here is what TCDD does after entering the body.

fer opinions on dioxin's most worrisome risks.

There was consensus that researchers — and risk assessors — should start paying closer attention to the potential for subtle behavioral and developmental problems at relatively low levels of exposure.

"If we're ten years down the road, I would predict that the major impact of dioxin is going to be behavioral, where we have absolutely no data going," said Edward Bresnick, a toxicologist at the Dartmouth Medical School in Hanover, N.H. "I'd certainly like to have a heck of a lot more data on that."

The current EPA standard for dioxin intake from drinking water is stringent. The agency now recommends that the average person receive no more than .006 picogram (a trillionth of a gram) of dioxin per kilogram (2.2 pounds) of body weight

per day. That amount is calculated to produce no more than a one in a million additional risk of getting cancer.

But the average person's intake of dioxin and dioxin-like chemicals from all sources is already estimated to be between 1 and 3 picograms per kilogram a day, or roughly 500 times higher than the EPA's current drinking water recommendation. The chemical is found at low levels in meats, fish, dairy products and other foods. It also is present in emissions from cars and incinerators.

Given such background exposures to the chemical, some scientists asked, does it make sense to cling to such a conservative standard for drinking water? As Klaassen put it, "If we are exposed to 1 picogram a day, it doesn't make sense for me to tell my mother we should be only exposed to .006."

But some of dioxin's subtle effects in

animals and humans may occur at intake levels at or close to the current background exposure. Reduced levels of testosterone, the male sex hormone, have been measured in workers and Vietnam veterans exposed to only a few multiples of the background dose of dioxin.

"Current body burdens of dioxin-like compounds may already pose a reproductive and developmental hazard," said panel member Dr. Claude Hughes of the Duke University Medical Center.

Determining whether there is a minute but acceptable level of dioxin exposure is likely to be a "very, very difficult, if not impossible, question to answer," said panel chairman Klaassen.

Should the government recommend more aggressive reduction of the dioxin throughout the environment, a task that could involve costly screening of foods for small levels of contamination? Or should it continue to concentrate on reducing exposure for at-risk populations such as workers or those who live near chemical plants and incinerators that release the chemical into the environment?

Those are some of the choices EPA's risk assessors ultimately must deal with after they receive the final scientific report by the end of the year. The agency is expected to decide by next summer whether standards for dioxin exposure

should be changed.

Some scientists abroad already have questioned the U.S. position on dioxin toxicity. Some believe that ingestion of 1 picogram of dioxin per kilogram a day — roughly the current daily intake for U.S. residents — is safe. The World Health Organization is even more liberal, saying there is a "tolerable daily intake" of 10 picograms per kilogram a day.

The Environmental Defense Fund has urged the EPA to identify those at special risk from dioxin. "It is clear that pregnant women, subsistence fishers and Native Americans have greater sensitivity or greater exposure," Peter deFur and David Bailey of the environmental group wrote to EPA. "Allowable levels of exposure should be tailored accordingly."

When it comes to making such policy judgments, some members of the science panel said their job is over. "The decision on how the chemical will be regulated is going to be made by the risk managers no matter what we say," said panel member Thomas Webster of the Center for the Biology of Natural Systems at Queens College in New York.

"I think our job is to discuss the science and come up with best numbers we can and talk about the uncertainty in those . . . I feel uncomfortable with being pushed to go beyond that."

NEWSDAY 6 OCT 92

is forthcoming, it will be increasingly difficult for anyone to deny the relationship between dioxin exposure and NHL/STS.

When we (military scientists) initiated the herbicide program in the 1960's, we were aware of the potential for damage due to dioxin contamination in the herbicide. We were even aware that the "military" formulation had a higher dioxin concentration than the "civilian" version, due to the lower cost and speed of manufacture. However, because the material was to be used on the "enemy", none of us were overly concerned. We never considered a scenario in which our own personnel would become contaminated with the herbicide. And, if we had, we would have expected our own government to give assistance to veterans so contaminated.

Dr. Clary might emphasize to my colleagues this was written by one of those scientists who wrote the Ranch Hand history. JAMES R. CLARY, Ph.D.

If this is true, then several agencies of the Federal Government have spent decades trying to keep the truth about agent orange from the general public. You need only read Dr. Clary's letter to come to that conclusion.

In spite of Government efforts to obfuscate and manage the science, the truth has been leaking out slowly over the years. And yet there are those in this Congress, in the administration, and throughout the country who continue to claim that there is not enough evidence to support compensation. No evidence, some say. For some, hiding the truth seems to be a full-fledged obsession. Perhaps, since we have a little time, I could set the record straight tonight. Let me say at this point, Mr. President, that I have the documents to support everything I am saying tonight. If any of my colleagues would like to see any of it, they need only to contact me.

The first studies with regard to humans and agent orange occurred in the period from 1974 to 1983. Dr. Lennart Hardell was the principal author of several of the so-called Swedish studies which began in 1974, with an additional study in 1981. These studies, for the first time, showed a link between exposure to pesticides made of agent orange components and both soft-tissue sarcoma and non-Hodgkins lymphoma.

As concerns grew, the Congress commissioned a large-scale epidemiological study, to be performed through the VA, of ground troops' exposure to agent orange and of potential health effects. It was legislation I offered in 1979.

After a series of revelations that the VA was being less than evenhanded with the study, there was general consensus that the study should be transferred from the VA to the Centers for Disease Control. We later learned that was a mistake.

Later, in 1984, the Air Force published its first morbidity report on the health status of those involved in operation Ranch Hand. The February 1984 Baseline Morbidity Report concluded that its results should be viewed as "reassuring."

During a February 1984 press conference, the Air Force emphasized that the study was "negative" and that the results were, again, "reassuring." The word reassuring has become very

familiar, and it seems to be the only one of the Air Force is willing to use to describe its findings, regardless of what the findings are. Rest assured, no matter what the study shows, it will be "reassuring." Sometimes, the evidence points to a serious problem, and, yet, the Air Force statement is, "It is reassuring."

At the same February press conference, one of the Air Force scientists--a principal investigator, chief statistician, and designer of the study--added some simple words of caution that further study was required and that some concerns remained. For having said that, he was taken off the project. We will come back to the Ranch Hand study in just a few minutes.

Later in 1984, we finally passed Public Law 98-542, compensation legislation that codified the reasonable doubt standard, provided for soft-tissue sarcoma compensation, and required the VA to establish standards for general agent orange and atomic radiation compensation. For the first time, the Congress addressed in somewhat of a comprehensive manner exposure to agent orange and what we ought to do about it. And yet, in all these years, having passed that legislation more than 6 years ago, not a single veteran was ever compensated for soft-tissue sarcoma, and to this date only a handful of veterans have received compensation for chloracne, a disease acknowledged by virtually everyone to be associated with agent orange exposure.

Although it was clear that the Veterans' Administration did not want to provide compensation. Public Law 98-542 at least in theory, established for the first time the reasonable doubt principle that might have prevented the need for further legislation had it been followed, and had the Federal Government acted in good faith in its scientific efforts.

Since 1984, Public Law 98-542 has been virtually ignored. In spite of the intent of Congress, in spite of the efforts of everyone involved in the writing of that law, in spite of our promises to veterans at that time that at long last, after all these years, they would be given the benefit of the doubt, not one veteran in this country has been compensated for any disease other than chloracne.

In 1985 and 1986, the New Jersey Agent Orange Commission reported that they were working on a blood test that could identify trace levels of dioxin and help approximate exposure in certain veterans. They pointed out that they could not rule out exposure, but that they could confirm exposure.

In the summer of 1986, the House Veterans' Affairs Subcommittee on Hospitals and Health Care hearing that I cochaired called witnesses from the Office of Technology Assessment, the Centers for Disease Control and others, to come before the Congress to explain what had happened with the CDC agent orange exposure study in recent years. OTA reported that the Centers for Disease Control had changed the protocol for the study without authorization. OTA also reported at that particular hearing that petty arguments at CDC were interfering with the study's progress and that progress had virtually

come to a stand-still. I should point out that this hearing reported no progress in 1986, seven years after the study was commissioned.

Well, after spending millions of dollars on the study protocol, the Centers for Disease Control suggested that a valid ground troop study could not even be done. They said there was no way to determine exposure and that military records were inadequate. They reported the last resort would be to explore blood tests for validating exposure.

The military records experts from the Army-Joint Services Environmental Support Group, led by Richard Christian, testified that military records were adequate and that, in his judgement, the Centers for Disease Control could do a valid study if they wanted to. We sent some followup questions to Mr. Christian at the time. DOD officials altered his followup testimony before it was sent to the Hill, deleting his information challenging CDC's claims. I ask unanimous consent that a DOD memo documenting this action be printed in the RECORD at this point.

There being no objection, the material was ordered to be printed in the RECORD, as follows:

SEPTEMBER 22, 1986.

A COMPARATIVE ANALYSIS OF MAJOR DIFFERENCES BETWEEN MR. RICHARD CHRISTIAN'S ORIGINAL ANSWERS AND MR. SAM BRICK'S CHANGED RESPONSES CONCERNING CONGRESSIONAL QUESTIONS FROM THE HONORABLE BOB EDGAR, THE HONORABLE TOM DASCHLE, AND THE HONORABLE TOM RIDGE

1. Congressman Daschle Question No. 1: All proposed ESG recommendations were changed. Mr. Brick's version does not fully respond to the question. All reference to General Murray and his report is deleted. The original attachment which was an extract from General Murray's report was deleted by Mr. Brick. The significance of this attachment (See Tab A) verified Mr. Christian's statement concerning the bizarre methodology that CDC employed in the congressionally mandated Agent Orange Study as documented by Major General John E. Murray during his peer review of ESG.

To Be Continued.★

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International

PUBLIC AWARENESS

AGENT ORANGE
DIOXIN

Albany, NY

THE TIMES UNION
CENSORS/SUPPRESSESCriminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health StudiesCONFLICT OF INTEREST???
No response as of:

How safe is dioxin?

The American Legion Magazine JAN, 1992

Reports that the government and industry are involved in a massive cover-up of the hazards of dioxin continue to flourish.

This time it's Liane Clorfene Casten, who works with the Fund for Investigative Journalism. In her upcoming book, *Lies and Contempt: Dioxin and Agent Orange*, she charges that federal officials have teamed with chemical industry representatives in a sophisticated public relations campaign designed to play down the harmful effects of dioxin.

Casten said the much publicized federal rethinking of the dioxin threat is being encouraged by the pulp and paper and lawn care industries. They both use or produce material that leaves dioxin in the environment.

"Their new 'findings' are based on

no more than three spurious sources, one of which is a fraudulent Centers for Disease Control study," she said. "Their 'proof' flies in the face of years of peer-reviewed studies of both animals and humans that identify a number of dioxin's toxic effects."

She cautioned that some of the nation's big newspapers are publicizing the campaign because they may own paper mills and have a vested interest in seeing the threat minimized.

Casten, whose book will cite AMERICAN LEGION MAGAZINE reports on Agent Orange, said veterans of Agent Orange spraying in Vietnam constitute just one group of victims of dioxin, those most heavily affected. Yet, she said the federal government has resisted granting compensation to most of them. Now, future health benefits may be in jeopardy.

THE TIMES UNION CENSORS/SUPPRESSES THE NEWS

A-6 THE TIMES UNION Albany, N.Y., Monday, August 26, 1991

How safe is dioxin?

ISSUE: The government says dioxin may not be as dangerous as thought.

OUR OPINION: Instead of being criticized, the government should be encouraged for revising its warnings as new information arises.

INTERNATIONAL
INDEPENDENT AGENT ORANGE NETWORK

New York State Agent Orange Victims Network
Agent Orange Petition Committee
C/O

Albany, NY 12206-3001

PH: [REDACTED]

Harry M. Rosenfeld, Editor
Times Union/Sunday Times Union
P.O. Box 15000 (518)454-5420
Albany, NY 12212

Dear Mr. Rosenfeld,

How much longer will the local news media including the Capital District's leading (?) newspaper allow the U.S. Government/industry DIOXIN conspiracy/cover-up to exist?

On Feb 23, 1990, I mailed to you expose legal documents/correspondence: Plaintiff-Appellees' brief, IL No. 5-88-0420 (extracts) filed Oct 3, 1989, App. Ct., 5th Dist., Illinois. RE: *Kemner et al v. Monsanto*, IL No. 80-L-970, etc. I mailed additional supporting information to managing editor Dan Lynch on Mar 26, 1990. I was disappointed (but not surprised) in not receiving any response from either of you, and I observed no improved coverage in the Times Union/Sun Times Union.

I hope you will favorably consider printing EPA scientist [REDACTED] whistleblower article 'UNRAVELING THE EPA DIOXIN CONSPIRACY' (Pesticides and You-National Coalition Against the Misuse of Pesticides, June, 1990).

If you decline or hesitate printing Dr. [REDACTED] article, I would appreciate a letter of explanation from you, which I intend to share with interested parties, including the International Independent Agent Orange Network. Additionally, it would be very helpful if you could do a better job of providing a more thorough coverage and examination of this vital Public Health issue in the future.

August 17, 1990

P 011 631 321
RECEIVED FOR CERTIFIED MAIL

Why might THE TIMES UNION participate in a public relations campaign to promote the view that dioxin is less dangerous than previously believed? The use of chlorine in industrial processes often leads to the creation of dioxin as a by-product; the paper industry is under great pressure to reduce its dioxin emissions.

James Ledbetter, a media columnist

For New York's *Village Voice* said Aug. 27 (pg. 8) said, "For some reason, August is dioxin revisionism month.... Once again, the chemical industry is trying to bamboozle federal regulators and the public, with the eager cooperation of the mainstream press," he said, citing the *Times*. Ledbetter suggested that perhaps the *Times*' "industrial-strength enthusiasm over eliminating 'strict and costly' standards can be traced to the fact that the New York Times Company has an 80 per cent interest in a Maine paper mill, and a 49 per cent interest in three Canadian paper mills. Indeed, on August 12, just four days before [the *Times*'s] editorial ran, two groups of Canadian Indians filed suit against Kimberly Clark and the Times Company for \$1.3 billion (Canadian), charging that one of the mills has polluted three rivers with dioxin and other toxins," Ledbetter said.

For example, the newsletter *Environment Week* reported Feb. 24, 1991:

A \$1 million punitive damages award by a Mississippi jury last October against Georgia Pacific (paper company) for alleged dioxin pollution of the Leaf River has touched off a stampede of similar suits against paper mills in Mississippi, Tennessee and several other states. The legal actions, which involve thousands of plaintiffs and billions of dollars in damage claims against major paper companies, have begun to resemble the avalanche of legal problems that hit the asbestos industry in the 1980s.

Enormous dioxin liabilities don't stop with the paper industry. On July 10, 1991, a Missouri jury awarded \$1.5 million to the family of Alvin J. Overmann, a St. Louis trucker who died of cancer; his workplace had been contaminated by dioxin. Several hundred similar lawsuits are pending in the Missouri courts now as a result of the contamination of the town of Times Beach.

*NOTE: 1 DEC 90-MAILED TO DAN LYNCH (T.U.) [REDACTED] EPA MEMO DATED

NOVEMBER 15, 1990, SUBJECT:

Criminal Investigation of Monsanto Corporation
- Cover-up of Dioxin Contamination in Products
- Falsification of Dioxin Health Studies

AMERICAN LEGION MAGAZINE November 1991
Former Chief of Naval Operations, Adm. Elmo Zumwalt Jr., has accused the government and the manufacturers of Agent Orange with a massive cover-up concerning the hazards of dioxin.

Zumwalt's charges came in a fiery 12-page statement filed as evidence in a New York federal court hearing of an Agent Orange class action suit by a group of ailing veterans and spouses of deceased Vietnam veterans. Also submitted as evidence in support of the veterans' claims was a 132-page affidavit from Dr. [REDACTED] the Environmental Protection Agency (EPA).

The affidavits of [REDACTED] and Zumwalt contradicted recent statements downplaying the hazards of dioxin by EPA Administrator William Reilly and Dr. Vernon Houk, director of the Center for Environmental Health and Injury Control at the Centers for Disease Control.

28 MAY 1990

Olympia, Washington 98503
THE STARS AND STRIPES—THE NATIONAL TRIBUNE

'Completely Unrelated'

Prior to Vic Johnson's return to New Zealand following our successful trip to Washington, DC, and the congressional subcommittee hearings on Agent Orange and HR-3004, we made a side trip to Burnaby, British Columbia, for a press conference.

The conference, sponsored in part by Thelma McAdams and the Health Action Network, presented yet another twist in the continuing saga. Keith Fraser, a reporter for the *Vancouver Province* newspaper, was presented with a notable quote from the Monsanto Company's director of Legal and Regulatory Affairs after allegations were made that domestic weed killers contained some of the same ingredients as Agent Orange, specifically 2,4-D. Keith MacMillen of the Monsanto Co. said, "The herbicides we use today are completely unrelated in chemistry, environmental impact and health effects." Furthermore, the company contends the chemical mix used in Agent Orange isn't the same as that found in commercial herbicides.

In Washington, DC, we challenged the Ranch Hand and CDC health studies on the basis of the alleged fraud disclosed in the Kemner, et al. -v- Monsanto trial. And now, we discover that the health comparisons being used in determining whether Vietnam veterans are at risk from their exposures to the toxic agents used in Vietnam are not even the same chemicals. Ilze Rupners, program officer for Agriculture Canada, said products with 2,4-D do not pose a health threat.

In the 10 May, 1990 *Edmonton Sun*, Canada's Deputy Prime Minister Don Mazankowski confirmed the presence of 2,3,7,8-TCDD in products containing Monsanto Company's Santophen 1, a product used in Lysol disinfectant products. Mazankowski said Monsanto voluntarily discontinued Santophen 1 in 1983. However, Roar Tungland, owner of the Strem Chemical Co. in Edmonton, Alberta, says he only quit using the product the week after Agriculture Canada notified him of the contamination.

Santophen is "O-benzyl-p-chlorophenol," made from 2,4-dichlorophenol. 2,4-D is also made from 2,4-dichlorophenol.

It was revealed during the Kemner, et al. -v- Monsanto Co. trial (No: 80-L-970) in Illinois that the santophen used by the makers of Lysol was contaminated with 2,3,7,8-TCDD dioxin at levels in the parts-per-billion range. The jury trial lasted 3 1/2 years. While the jury only awarded the plaintiffs' \$1 in actual damages, they also awarded \$16.25 million in punitive damages.

In a 3 Sept. 1981 letter from Monsanto's James D. Wilson, manager, Research and Development, to Dr. C.F. Mendoza, Dept. of Health and Welfare, Health Protection Branch, Ottawa, Ontario, Canada, Wilson said "Santophen-1 (Monsanto O-benzyl-p-chlorophenol) has been analyzed for 2,3,7,8-tetrachlorodibenzodioxin (2,3,7,8-TCDD) by an analytical method capable of detecting 0.5x10 g/m/TCDD/gm Santophen-1; none has been detected." However, in sworn testimony of 10 May, 1985, James D. Wilson acknowledged the above statement was incorrect—but it wasn't a lie, because "lying requires the intent to deceive." I also find it interesting to note that Keith MacMillen was provided with a copy of the James D. Wilson letter. Is MacMillen aware of the jury's findings against his employer?

With all these new disclosures, it becomes very clear why NDP MP Ross Harvey, of Edmonton, Alberta, has requested independent analysis of approximately 56 products in Canada using various forms of benzyl-chlorophenol. Can anyone seriously question claims of foul play alleged by Vietnam veterans who challenge United States Air Force Ranch Hand studies of the health effects of veterans exposed to Agent Orange in the Vietnam War? Studies in which Lt. Col. William H. Wolfe, USAF, MC and Ranch Hand study author sought the assistance of Monsanto and Dr. Raymond R. Suskind for assistance in conducting a morbidity study.

Woody Carmack, president of the Vietnam Veterans of British Columbia, says the veterans in his organization haven't been adequately tested for Agent Orange exposure even though they are showing the same symptoms as Vietnam veterans from the U.S., New Zealand and Australia. With the current membership at ap-



proximately 500, Woody says the biggest fear for their veterans is the probable findings of association of health conditions and exposure. Woody also noted that most of the Vietnam veterans who belong to the BC organization are living in self-imposed isolation. And with health care in Canada providing medical attention to all, little data is available to assess the actual numbers of veterans who may be suffering from chemical exposures.

Woody says his greatest frustration is dealing with the bureaucracy in the Seattle Veterans Administration and its policies regarding Canadian Vietnam veterans. Getting assistance for his members who are suffering with symptoms of post-traumatic stress disorder (PTSD) have been next to impossible.

Attempts to work with service organizations within Canada until recently were met with similar difficulties. Vietnam veterans from Canada wore the American uniform, and so, rather than being viewed as veteran patriots, have been shunned as mercenaries. An interesting classification for more than 30,000 of Canada's sons, considering the number of Americans who chose Canada over military service. Don't misinterpret this. Had I known then what I know now, I too would have chosen Canada.

My point is this: Vietnam veterans didn't create the Vietnam War, they simply answered their nation's call to arms. They simply obeyed the "law." The legality of the war is a question for the politicians of the era and thus any wrongdoing should have been the responsibility of the politician, not the veteran.

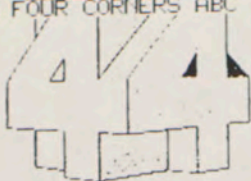
Like the war itself, logic and rationality seem to have taken a holiday. While citizens who chose to evade military service were "pardoned" by the U.S. government, Vietnam veterans are still being denied due process of law. I strongly suspect that another call to arms by the U.S. government, with the Vietnam situation yet to be resolved, will be disastrous. Canada will have to build an "Iron Curtain" to stop the masses from crossing the border. ★

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25 January 1991

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[REDACTED]

Olympia, Washington 98503

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Virginia passed your fax to me requesting authorisation to air "Chemical Warfare" on the 50 Plus Cable Access Channels.

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Please let Michele Weavers at the above fax number know if you require a copy of the programme. If so, please let her know what tape format you require.

Yours sincerely

M Weavers

for

PAUL WILLIAMS
Associate Producer
Four Corners

NOTE: '4 CORNERS' TV PRGM IS EQUIVALENT TO OUR CBS-TV '60 MINUTES'. WE INITIATED THE EXPOSE OF THE MONSANTO, ETC FRAUDULENT STUDIES IN MARCH 90. IT WAS TELEvised IN AUSTRALIA & NEW ZEALAND IN AUG 90, FOLLOWING THE U.S. HOUSE SUBCMTE ON GOVT. OPNS (REP. TED WEISS, CHMN) HEARINGS HELD ON 26 JUN 90. AMONG THOSE INTERVIEWED WERE: ADM L ELMO ZUMWALT, PLAINTIFFS ATTN Y REX CARR, AN ATTN Y FOR MONSANTO, PETER KAHN, PH.D. N.J. ADM SN POINTMAN STUDY, OTHER SCIENTISTS AND JOE COLE. IN THE U.S. THE EXPOSE IS BEING SHOWN ON BRAVO VETERANS FORUM SYNDICATED ON 50+ CABLE OUTLETS ACROSS THE COUNTRY. [REDACTED]

NOTE: ATTACHMENT TO 'NOT GUILTY'S' & S 7 JAN 91.

Olympia, Washington 98503

Not Guilty?

Monsanto officials deny that a multi-million dollar punitive damage award granted by an Illinois jury is an indication of wrongdoing. The suit was filed by the residents of Sturgeon, MO, following their exposure to 19,000 gallons of dioxin-contaminated "OCP-crude" when a train derailed 10 Jan., 1979.

The investigation by the EPA came as a result of Frances E. Kemner, et al. vs. Monsanto, Case No. 5-88-0420, where the jury awarded \$16.25 million in punitive damages against the Monsanto company. The St. Clair County, IL, jury is believed to have made the award based on the potential for future harm, which is legal under Illinois law.

The investigation by the EPA of possible criminal wrongdoing involves health studies perceived by many as fraudulent. Following an explosion at the Monsanto 2,4,5-T plant in Nitro, WV, in March 1949, Monsanto employed Dr. Raymond Suskind to examine possible adverse health outcomes of the exposed employees. Evidence presented during the Illinois trial suggests the studies were manipulated to show a more favorable result. Monsanto, of course, denies this.

In June 1990, the Australian Broadcasting Corp. sent its "Four Corners" news team to the United States to investigate the allegations. The show's producer Virginia Moncreiff and news anchor Neil Mercer spent six weeks meeting with representatives in congress, Monsanto officials, plaintiffs' attorney Rex Carr, Adm. Elmo Zumwalt Jr., Dr. Cate Jen-

RE: AGENT ORANGE - AUSTRALIAN TV EXPOSE OF MONSANTO ETC

kins, Dr. Ellen Silbergeld, Dr. Peter Kahn and me, among others. The Australians crisscrossed the U.S. seeking answers to questions presented by the Vietnam veterans of Australia, who believe Agent Orange caused their health problems.

The Australian government's investigation of the Agent Orange issue terminated in 1985, following the finding of Justice Phillip Evatt that Agent Orange was "not guilty." Justice Evatt's findings relied heavily on data supplied by Monsanto. However, when Mercer questioned Evatt's chief science advisor after viewing the new evidence, he agreed Vietnam veterans should be given the benefit of the doubt and accorded service-connection.

Plaintiffs' attorney Rex Carr told Mercer that all the Monsanto studies were based on "sand," noting that Monsanto's own medical director, Dr. George Roush, admitted in court that the studies could not be relied upon to assess health risks. Carr pointed to data manipulation as the cause. He said he found that studies completed in 1980, using employees exposed during the 1949 accident, were compared to employees who also worked at the plant but in different buildings. In another study, employees listed as exposed in the 1980 study were again examined in yet another study completed in 1983. This time, however, some of the previously exposed group were listed as non-exposed. In reality, the EPA had determined that dioxin was present throughout the plant and extended beyond the Monsanto facility. Thus all study participants were likely contaminated to some degree.

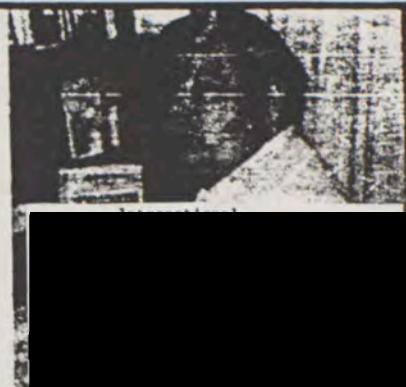
I have read several thousand pages of the trial transcripts and found them to be

revealing and shocking. Monsanto, Dow and other companies have research policies of using rabbits to determine the presence of dioxin in their products. Simply put, they swab the rabbits' ears with the product and if the rabbits develop chloracne they attribute the effect to the presence of dioxin.

Another incident involved Monsanto's Dr. James Wilson, who informed Canadian government officials that Monsanto products being shipped to Canada were free of dioxin contamination. Wilson admitted in court that his statement was inaccurate, acknowledging that some of the product was in fact contaminated. Wilson told the court that this didn't indicate that he had lied to anyone, because lying required proof that his actions were intended to deceive.

It was also disclosed during the trial that Dr. William Wolfe, the director of the U.S. Air Force Ranch Hand studies, had requested and received authorization to participate in the Monsanto health studies. Wolfe wanted to learn how to conduct the Ranch Hand study he had been charged with completing. Justice Evatt had also cited the Ranch Hand studies as a basis for finding Agent Orange not guilty of causing harm.

However, Mercer learned of political manipulation of the Ranch Hand studies during a visit with Dr. Peter Kahn of Rutgers University. Dr. Kahn explained that findings of adverse health effects were ordered deleted from the final report. Kahn didn't say who ordered the deletion, but noted they were not scientists or anyone actively involved with the research. Later, Mercer met with Adm. Zumwalt, who cast the accusing finger at



Reagan administration officials and the CDC.

Vietnam veterans in Australia were granted service-connection for non-Hodgkin's lymphoma following these disclosures. However, the Australian government continues to resist all attempts to reopen the "Evatt Royal commission." Thus the Vietnam veterans of New Zealand, who are bound by the Australian report, have asked their parliament to convene their own Royal Commission of inquiry. The drive, spearheaded by medically retired Vietnam veteran Maj. John Moller and Victor Johnson of Tauranga, has succeeded in gaining verbal support from both political powers. John says a formal vote empowering the commission is expected at any time.

Virginia Moncreiff sent me a copy of the "Four Corners" newscast and I must tell you I have never seen a more indicting documentary. The program provides the opportunity for the viewer to decide what they're being told by the various groups or agencies involved. It's unfortunate that viewers in the U.S. are being denied the privilege of viewing this outstanding documentary. ★★

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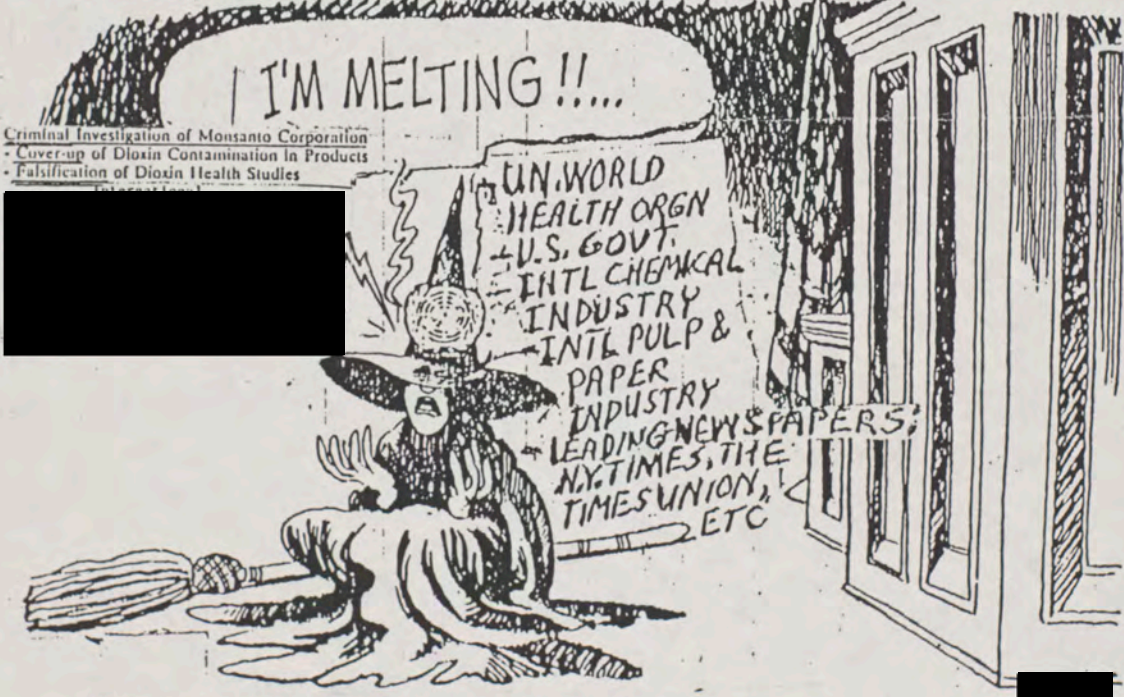
THE TIMES UNION

CENSORS/SUPPRESSES THE NEWS

CONFLICT OF INTEREST??
No response as of:

Criminal Investigation of Monsanto Corporation

Cover-up of Dioxin Contamination in Products
Falsification of Dioxin Health Studies



THE DIOXIN/AGENT ORANGE
CONSPIRACY!

"Truth is not only violated by falsehood.
It may be equally violated by silence".

-Amile-

(PLEASE COPY AND CIRCULATE)

Point of View Agent Orange: Resolving A Painful Vietnam War Legacy

From The Heritage Foundation

The recent \$180 million out of court settlement in the "Agent Orange" case leaves unresolved one of the most painful legacies of the Vietnam War, the continuing controversy over the health effects of the chemical herbicide.

Many Vietnam War veterans believe that the substance has caused a number of illnesses which they have incurred, and produced birth defects in some of their children.

More important, the veterans feel that the Veterans Administration, the Department of Defense and Congress have not responded to their complaints.

As a result, some of these veterans are pushing for legislation which, though well-meaning, could have very damaging effects.

At the heart of the controversy lies the dilemma of how best to deal with latent illnesses—diseases which manifest themselves years or even decades after a soldier is out of uniform.

While the nation justifiably is obliged to provide medical treatment for injuries or illnesses incurred as a consequence of military service, establishing the cause and effect relationship between a latent disease and military service often can be extremely difficult.

The uncertainties surrounding the health effects of Agent Orange have led some in Congress to demand blanket compensation for all veterans who served in Vietnam—regardless of the medical evidence.

Yet in the long run, this could undermine the long-standing commitment of the U.S. to provide

medical care and, where appropriate, compensation, for Americans with service-connected health problems.

One problem is that the blanket compensation approach does not differentiate between those illnesses that merely require medical treatment, and those that are disabling.

Moreover, by focusing exclusively on Agent Orange, legislation may jeopardize future claims by veterans affected by other hazards.

THE HERITAGE FOUNDATION IS A CONSERVATIVE THINK-TANK IN WASHINGTON, DC, 214 MASS. AVE, WASH, DC, 20002. PH (202) 546-4400 MILT COPOULOS(VIETNAM-TWO TOURS).

Most important, by awarding compensation to veterans, irrespective of the medical evidence, the legislation threatens to undermine the foundation of veterans benefits: the notion that eligibility for treatment or compensation derives from reasonable medical evidence indicating that the illness or injury was a consequence of military service.

Should this standard be undermined, the veteran's compensation system could become as vulnerable to political manipulation as other entitlement programs, allowing claimants with sufficient political clout to win benefits regardless of the merits of their case.

Therefore, it is necessary to devise a system whereby a link between a latent illness and military service can be established beyond a reasonable doubt, but which does not entail undue delays in processing claims.

To achieve this goal, it may be necessary to deemphasize the identification of specific causes of specific illnesses, and instead, use statistical techniques to identify broad classes of illnesses that afflict veterans to a disproportionate degree.

This could be accomplished through the use of epidemiological studies, which focus on discovering which illnesses statistically can be attributed to military service. Use of such studies eliminates the need to identify a specific environmental factor that caused the disease, or the need to prove that a veteran was exposed to it.

By demonstrating that veterans are suffering from an extremely high incidence of a specific illness—say malaria—the Veterans Administration then could allow a presumption of service connection entitling the veteran to treatment.

Three ongoing studies of the health of Vietnam veterans should be undertaken to determine if they are suffering from particular illnesses in greater proportions than the population at large.

The first study should focus on those veterans involved in operations that made exposure to chemical herbicides very likely.

The second study should focus on all troops who served in Vietnam. The third study should examine all who were in uniform during the Vietnam War.

The results of these studies should be reviewed by a panel of experts, who would be allowed to make a presumption of service connection where the statistical

evidence warranted.

There are several advantages to this approach. First, it would aid preventative measures, since the servicemen exposed earliest would be the first to manifest symptoms, allowing screening and early treatment of other Vietnam veterans.

Second, it would not tie treatment to establishing the cause of the illness. This avoids the spectacle of veterans left to languish while a medical debate goes on about the cause of their disease.

Most important, since the panel would be allowed to make a presumption of service connection without additional approval from either the Congress or the VA, it would depoliticize the process of making such determinations.

This would both expedite timely treatment for veterans, and help to prevent unscrupulous individuals from using their complaints for political gain.

Such ongoing epidemiological studies would have consequences going far beyond the immediate problem of chemical herbicides. The approach would create a mechanism for dealing with other latent diseases incurred as a result of military service as well.

The importance of having such a mechanism in place cannot be overestimated.

The experience of modern warfare suggests that latent diseases will become an increasing problem for those charged with the care of veterans.

If the nation is to honor its obligations to those who don its uniform, the mechanism will be essential. *

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* Re: Dioxin toxicity/EPA regulation/Ah receptor see Chemical and Engineering News (8/12/91); 69:7-14 (see skulduggery @ NIH/OSI on p4). See dioxin (TCDD) syndrome ["AIDS"] table on p10 (source: EPA). From pp12-14 : "According to Linda S. Birnbaum, director of the environmental toxicology division of the EPA Health Effects Laboratory in Research Triangle Park, N.C. ... it looks like immunotoxicity may be the most sensitive indicator of TCDD effects, and this is clearly a problem." --- Re: CDC/NIOSH (Fingerhut) dioxin worker studies see the follow-up correspondence in NEJM (6/20/91); 1809-12. On p1811 Fingerhut says: "We reiterate that our high-exposure group had a 46 percent excess of all cancers combined, not a meager shift." On p1812 Bailar says: "The letter from Hardell et al. [p1810] substantially reinforces this conclusion." Credit: Paul Merrell

* ANNOTATIONS BY DAVE BURGH - [REDACTED]

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