

August 2, 1949

AIR MAIL

Mr. C. E. Chase,
200 North Miller Street,
Wenatchee, Washington.

Dear Mr. Chase:

It has not been through negligence, but rather through intense involvement in a series of rather urgent responsibilities, which has kept me from replying until this time to your letter of June 1. Even now I shall not be able to reply adequately, since I am trying to clear up my tardy correspondence in preparation for a trip that will keep me out of my office for some three weeks. I shall not burden you with a detailed explanation of my delay, except to say that I have been completely unable to deal with anything but the most immediately urgent matters that have come to my desk during the last two months.

The question of the adequacy of the facts which might be available at this time for presentation in a hearing or series of hearings concerned with setting tolerances on various insecticides, is a very difficult one to answer. Too many of the facts are lacking to lead to completely satisfactory settlement of the problems. On the other hand, it seems rather unlikely in the present state of human society that the answers will be obtained in wholly satisfactory form, by any other method than that of trial and error. Consequently my feelings are somewhat divided in this matter. I would like to see the questions of fact settled, but I am sure that they will not be settled now or at any other time, unless some pressure is put upon the producers and purveyors of food materials to demonstrate that their practices are safe. In connection with this entire program of the use of insecticidal materials, or what are now called generally economic poisons, I have not observed that the manufacturers of these products have been particularly interested in establishing the background on which they could be used with safety. Neither have I seen that the users of these products have been very much concerned to solve the ultimate problems of public health that arise from their use. It is only when we have a food and drug administration that exerts itself in the public behalf that sufficient attention is brought to these matters to provide the research that will answer the problems. Consequently, while I am heartily sympathetic with the individual food grower, I am bound to feel that public safety is increasingly dependent upon the application of pressure by such a public agency as the Food and Drug Administration. Consequently, when I was asked recently whether I would take part in a hearing or hearings of this type, I expressed my reservations about the adequacy of the information, but I accepted promptly the professional obligation of being present.

Mr. C. E. Chase - (2) - August 2, 1949

I find that everything you say on the subject is reasonable, and I am particularly impressed with your statement that "the apple and pear industry.....does not at the present time use any form of Fluorine or Arsenate of Lead." If this is the case, there may not be too much point in a hearing on these items at this time.

To answer your question specifically, we have done a very considerable amount of work on DDT, and my associate, Dr. Heyroth, has been trying to get together a long report on the subject which reviews the literature, such unreported work of others as has come to us in various ways, and our own observations. Unfortunately, the results of various observers on the subject of the tolerable concentration of DDT in food materials are not in complete agreement. It is particularly unfortunate that governmental agencies do not seem to agree with each other.

We have carried on no observations on Parathion, but are fairly familiar with such work as has been done unless some has been going on quietly without our knowledge. We have also been working to some degree on chlordane and benzene hexachloride, and we expect to do some considerable work on Toxaphene. There may be information which would be helpful in establishing a tolerance on Parathion, and in the case of DDT, if some of the disagreement can be resolved, it would seem that a tolerance could be set without too much difficulty.

You referred to my visit to Germany and my report. I may say that the latter was originally confidential, but it is no longer, and I think it could be obtained in the usual manner from the T.E.A. in the Department of Commerce. Actually, however, what I learned in connection with insecticides was of interest primarily in connection with their experimental development, not with matters related to public health concerning it. The Germans were very active indeed in developments that would lead to the manufacture of these products, but so far as I was able to find, they had not done the toxicologic work that would reveal the significance of low dosages over long periods of time.

I am very much interested in what you have to say about the use of DDT and Parathion. The latter, in my opinion, is a very dangerous material, which should be handled with a great deal more care than it has commonly been given. Whether there is any chronic effect, however, is unknown to me, and this should be worked out with great care. I would certainly, at some convenient time, if there is any such time, like to be able to see the problem that exists in the orchards, in the practical handling of these materials. I have had no experience along this line, and I should feel much better informed if I had been able to see for myself how they are used and what happens. Any information that comes to your attention on any aspects of the hazard of the practical use of these materials in your area, would be of the greatest interest to me.

KE 0008456

Mr. C. E. Chase - (3) - August 2, 1949

With kindest regards,

Cordially yours,

Robert A. Kehoe, M. D.

RAK:ec

Dictated but not read.

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