TESTIMONY ON PCB CONTAMINATION

IN TENNESSEE RIVER VALLEY

presented by

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to the

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Mr. Chairman, I appreciate the opportunity to appear before the Subcommittee on Oversight and Investigation to discuss polychlorinated biphenyls (PCBs). I wish I could say I am here with good news, but that is untrue. Instead, I must report the discovery of yet another contamination, this time in the Tennessee River Valley. This incident illustrates again the ubiquitousness of PCBs in the environment in ways that, at first glance, are hard to imagine. Our handling of this incident does, however, indicate that we are getting better at dealing with environmental contaminants, partly as a result of this Subcommittee's insistence.

History of this Incident

Since late December 1979, USDA has been investigating the possibility of PCB contamination in Northern Alabama. We began the investigation as the followup to an inconclusive finding on a sample of pork being exported to Japan. We took additional samples that finally resulted, after much scientific discussion, in the positive identification of PCB in late January. We went up a number of blind alleys in tracking down the source of the contamination, but in the past week the situation finally became clearer, as we were finally able to correlate positive, violative analytical findings on three small farms in the Northern Alabama area with the results of an epidemiological investigation.

The major source of contamination now appears to be corrugated steel siding originally used to build a Reynolds Metal Company facility near Florence, Alabama in 1941. For protective purposes, the manufacturer of the siding,

H. H. Robertson Company of Pittsburgh, Pennsylvania, applied an asphalt-like insulating material to the sheeting. We now find that this sheeting contains variable amounts of PCB from trace levels to those in excess of 40,000 parts per million. In the early 1960's Reynolds began disposing of the corrugated siding, replacing it with aluminum. A relatively large but as yet unkown number of farmers either bought or scavenged this siding and installed it on their farms. From our epidemiological investigation, our current belief is that the siding may be confined to a 50-mile radius encompassing Northern Alabama, Southern Tennessee, and Northeastern Mississippi.

If swine comes into contact with the siding in a continuous fashion, they appear to develop an appetite for the coating material and consume it. We cannot assume contamination to livestock will occur simply because the siding is on a farm. Hogs must come into contact with it for an extended period of time and have the opportunity to eat it. Although we believe a large number of small farms are candidates for contamination, a much smaller number are probably directly at risk. So far we have identified three farms with contaminated hogs at maximum levels of about 10 ppm, significantly above the FDA tolerance levels, but not high enough to cause any acute health problems.

Current USDA Actions

In order to control this particular situation, we are taking a number of actions in cooperation with the State Departments of Agriculture in Tennessee, Alabama, and Mississippi as well as the State Extension Services:

(1) All farmers in the affected area will receive information explaining the current situation and advising them to avoid any possible exposure of animals to the material.

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(2) A contamination control center with toll free telephone lines has been established in Montgomery, Alabama to answer questions from farmers who may have the building material on their farms. Farmers can arrange to have a Federal or State representative visit their farms to identify the material, make arrangements to test animals if necessary, or certify that no problem exists on the premises.

(3) Farmers who have not made contact with Federal or State agriculture officials will be visited systematically over the coming months to insure that any potential contamination situation is corrected.

(4) USDA will pay for the testing of suspect animals slaughtered for home consumption. We are especially concerned about such product since these households would polentially encounter long term exposure if their home slaughter animals were contaminated. The Control Center in Montgomery may be contacted to arrange for this government paid testing.

(5) USDA has radically increased its testing of food animals at area slaughter houses to determine any further sources of contamination. Animals suspected of containing violative levels of PCB will be tested before being released into food production channels.

In developing what I believe to be a measured response to the situation, we have kept a number of factors in mind:

— The low probability that meat in any significant amount is reaching the marketplace because of the necessity for continuous contact between animals and the siding before contamination can occur and the small number of animals on any one farm at a given time.

— The nature of the contamination itself; unlike the recent Montana incident, we are not dealing with a spreading source of contamination through the animal feed supply. This makes it easier to cope with, because we can see and eliminate the source of the contamination.

— The necessity to obtain the cooperation of farmers in the region. As I'm sure many of you know, it would not be wise for Federal agents to swoop down on small farmers in this or any part of the Country. We need the cooperation of the local extension people to reassure farmers that the government is interested in helping to eliminate a problem.

— The awareness of the people in the area to toxic substances. Because of the Center for Disease Control is studying the effects of widespread toxic substance contamination in tha Triana, Alabama area, our epidemiologists believe that the average person is more sensitive to contamination problems, and hence more willing to listen to a government education and control program.

We are, of course, prepared to take what ever actions are necessary to ensure the wholesomeness of the food supply. We have considered the option of a full scale certification program in which all farmers would be forced to present positive proof that they are free of the siding bafore their animals are released from the slaughterhouse. At this time, we do not believe that is desirable because of the blizzard of paper it would create, as well as the severe disruption in the

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marketplace. We have met with the responsible State officials, and think we can handle the problem within the limits just outlined. While it is important to act promptly and effectively in the situation, I believe that we must be flexible in our response. If we begin to see increased levels of violations in our monitoring program, however, we will of course have to reassess the situation.

Hard Lessons

In September, this Committee criticized us for our initial performance in handling the Montana incident. Since then we have made a number of changes that I believe are reflected in the conduct of this present incident.

First, we have become much more aggressive and aware of our responsibilities concerning environmental contaminants. Any analytical results even remotely out of line are being referred quickly to our residue analysis staff for followup. In addition, we are planning a comprehensive series of seminars for all critical field employees to ensure that there is no decline in commitment. In this particular incident, only diligence of the scientific and epidemiological staff enabled us to identify the substance and the source.

Second, we have defined the conditions that trigger a coordinated response and have established distinct channels of communication, explicit responsibilities, and a set of contingency plans that enable us to respond quicker and surer. I'd like to submit for the record a copy of our recent Report on the PCB incident in the Western United States which contains an outline of this Contamination Response System. In this instance, we have used this system and have cooperated and communicated with EPA, FDA, and the responsible State agencies and interest groups all aspects of our response.

Third, our Montana experience taught us that we must have responsible people near the source of the problem who can make decisions immediately. As I stated earlier, we have established a Command Center in Mobile for this purpose.

Fourth, we are today proposing regulations to ban the use of new or replacement liquid PCBs from meat, poultry and egg production facilties in this country. I would like to have this proposal, which will appear tomorrow in the Federal Register, also included in the record. While this regulation would not have prevented this incident, it will help to limit the potential sources of contamination in the future. As I am sure you know, we are working together with EPA and FDA on a regulatory strategy to phase out all PCBs from food and feed facilties.

Fifth, the Administration will shortly propose changes in the law to authorise USDA to quarantine animals on the farm if they are suspected of contamination, and to require identification of all animals as they come to slaughter. If we had this legislation in place today, we could more quickly locate and control contamination.

I cannot tall you that we have overcome all the structural limitations I spoke to you about in September. This is especially true of the limitations that result from the lack of adequate technology. For example, we still do not have suitable tests for detecting many of the toxic chemicals that may occur in the food supply. Many of the tests we do have depend upon complicated and expensive analytical techniques which limit coverage and creat time lags in detection. For this type of limitation, there is no immediate solution

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beyond the continued research in which the Department is now engaged. There has been some notable progress in the past year - particularly in developing simpler, less expensive tests for drug residues - but we must admit that gaps in detection technology are going to remain with us at least for the near future.

Even considering technological limitations, we recognize that our residue monitoring system can and should be redesigned to provide better coverage. As I stated in my September testimony, the present monitoring effort provides 95 percent assurance that over the course of a year it will catch any contamination that involves more than one per cent of the Nation's meat and poultry supply. We are now actively exploring ways to see how this net might be tightened. One particularily promising avenue is the development of cooperative programs with states and industry for the testing of animal feed. We are also examining the statistical design of our monitoring program to improve coverage by including more information of agricultural use of chemicals, the history of past incidents, distribution patterns for animals, and distribution patterns for feed. By including more information, the focus of the monitoring program can be changed from one whose main purpose is an accurate statistical picture, to one whose purpose is to maximize the chances of detecting contamination incidents at the earliest possible point. We will be making these changes in the months ahead as we attempt to move the national monitoring program in a new direction that will provide increased protection for the public.

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In the final analysis, however, we are living with the consequences of decisions we made decades ago about the use of industrial chemicals. Incidents like Montana and Alabama may only be the tip of the iceberg of a challenge that may become the most important food safety question in the last part of this century. It makes even more important the efforts of all Government agencies, especially the Environmental Protection Agency, to rid these chemicals from our environment.

Mr. Chairman, this completes my written testimony.