a substantial difference in costs of testing new or established products.

The General Accounting Office disallowed $600,000 in the Manufacturing Chemists' report for "maintenance of inovation," defined as *costs of keeping the rate of introduction* of new substances at current levels. Havens said he is uncertain why a firm would want to do this, nor is he aware of how the figure was reached.

GAO generally discounted the "ripple effects" a toxic substances law might have on unemployment or on reductions in gross national product, issues discussed by both Dow and by *the Manufacturing Chemists. Havens said uncertainties* about economic modeling make these estimates questionable.

"Faced with the necessity of stating some cost figure, we would feel least uncomfortable with a range that included the EPA high estimate and went somewhat higher than that to take account of the point about costs of testing existing chemicals," *Havens said. "This would include estimates of* cost that may range from $100 million to $200 million per year."

Witnesses from the Manufacturing Chemists Association and from Foster D. Snell, Inc., which prepared the study, detailed the results of the report and defended the methodology used. Senator John V. Tunney (D-Calif), chief sponsor of a toxic substances control bill (*S 776*) strongly opposed by industry, challenged Manufacturing Chemists counsel Daniel Mayers to release data on which the report was based, but Snell said the raw data were destroyed after the aggregate results were compiled in order to guarantee the confidentiality of the corporate information.

Other Witnesses

J. Clarence Davies, who chaired a National Research Council study group, presented results of a study, "Decision Making for Regulating Chemicals in the Environment (July 18, p. 486), and Orin Smith, president of M&T Chemical Company in Greenwich, Conn., told the subcommittee that although his firm favors the intent of proposed legislation, he fears it does not address concerns of small chemical companies.

Smith said that specialty chemical manufacturers, for instance, could be ruined by testing of a very small volume of their production. He asked the subcommittee to assure that the EPA Administrator would implement the law *reasonably.*

Although the subcommittee has not heard all witnesses scheduled, Tunney said he hopes the hearing would be the last before the subcommittee begins markups in a few weeks on S 776 (October 31, p. 1006).

Polychlorinated Biphenyls

John L. Buckley, *a consultant to EPA's Office of Research* and Development, told the subcommittee that although he had hoped in 1972 that polychlorinated biphenyls (PCBs) were under control, EPA still is concerned about their release into the environment.

Not only have voluntary control measures failed, Buckley said, but the situation actually has worsened. He said unacceptably high levels of PCBs have been measured in fish in California, in the Great Lakes, and in the Hudson River. Importation and open-system use of PCB's have continued, Buckley said in urging enactment of federal toxic substances control legislation.

He told the subcommittee EPA, the Council on Environmental Quality, and the Departments of Agriculture, Interior, and Health, Education, and Welfare are sponsoring a national conference on PCBs in Chicago November 19-21. Representatives of federal and state agencies, industry, environmental organizations, and universities are to present information at the conference for consideration in regulating toxic substances.

Solid Waste

AFL-CIO APPROVES RESOLUTION AGAINST BANNING 'THROWAWAYS'

A *resolution against legislation restricting sale or use of* nonreturnable containers was passed unanimously by the American Federation of Labor/Congress of Industrial Organizations (AFL/CIO).

The resolution recommends that "Congress take positive action in supporting legislation" that would promote demonstration, construction, and application of solid waste *management and resource recovery and energy conserva*tion systems; provide technical and financial assistance to states, local governments, and interstate agencies in planning and developing resource recovery, energy conservation, and solid waste disposal programs and facilities; and promote a national research and development program for improved techniques, more effective organizational arrangements, and new and improved methods of collecting, separating, recovering, and recycling solid wastes, and for environmentally safe disposal of nonrecoverable residues.

It recommends also that Congress support legislation to provide for adoption of guidelines for solid waste collection, transportation, separation, recovery and disposal systems; and to provide for training grants in occupations involving design, operation and maintenance of solid waste disposal, and energy conservation systems.

The resolution says container bans or proposals to curtail use of certain materials are "really non-solutions" to solid waste problems. "By disrupting industry and causing heavy losses of jobs, more problems would be created than solved," the resolution says.

Water Pollution

NEW TIMETABLE SET FOR NCWQ BY ROCKEFELLER CAUSES CONFLICT

An October 21 memorandum to National Commission on Water Quality commissioners from Commission Chairman, Vice President Nelson A. Rockefeller establishing a new timetable for completion of the commission's work has created conflict among several persons closely involved with *the commission's work.*

Under the revised timetable, Rockefeller directs that the commissioners complete consideration of staff documents, including draft recommendations prepared by the staff, during the period of October 26-November 26; that the documents continue to be revised based on commissioners' consideration and input during the period of November 10-*November 28; that a draft report preparatory to public* hearings be printed during the period of November 28-December 6; that the public review period be from December 6-January 4; that public hearings be held and that the final rewriting begin between January 4-January 18; that the final rewrite be finished between January 18-January 31; that the final report be submitted to and prepared by the *printers in the period February 1-March 1; and that the* report be submitted to Congress March 1.

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MONS 068223