Initially, four laboratories would be established at the regional level, preferably, the report said, in existing State facilities. Federal scientists would man the labs, however, and their primary purpose would be to act as liaison between regional and national levels. In addition they would:

" . . . Provide analytical capability and technological assistance for regional level investigation teams; assist in the development of adequate laboratory capability in each State where such facilities are warranted; assist in analyzing agriculture-related samples for environmental residues, pesticides, feedadditives, microbial contamination, or other substances and provide the technical assistance necessary to develop and conduct the appropriate methods for sampling.

FDA ISSUES FINAL ENVIRONMENTAL STATEMENT ON PCBS

The Food and Drug Administration last week put on display an environmental impact statement on the industrial chemical, polychlorinated biphenyls, forecasting the temporary tolerances the agency expects to allow for food, feed and packaging.

"The tolerances are established," the agency said, "because the FDA recognizes that total, immediate elimination of PCBs in these articles is not possible and that controls in uses of PCBs will reduce unavoidable contamination of foods.

The first version of the environmental impact statement had been published last fall. After holding the record open for 90 days for comment and receiving a storm of protest from the packaging industry, FDA revamped the tolerances for infant food, packaging and animal feeds. The tolerances and changes included:

(1) Milk and dairy products, 2.5 parts per million on a fat basis (no change); (2) poultry, 5 p.p.m. on a fat basis (no change); (3) eggs, 0.5 p.p.m. (no change); (4) complete and finished animal feeds, 0.2 p.p.m. (changed from 0.5 p.p.m.); (5) animal feed components, 2 p.p.m. (changed from 5); (6) fish and shellfish, edible portions, 5 p.p.m. (no change); (7) infant and junior food, 0.2 p.p.m. (changed from 0.1); and (8) paper food-packaging material, 10 p.p.m. (changed from 5 p.p.m.).

The Environmental Protection Agency, as well as food packagers, had objected to the 5 p.p.m. limit for food packaging on the grounds that it would discourage the use of recycled paper.

FDA, which also changed the statement to allow use of barriers between paper packaging and foods, said its investigations reveal that a significant percentage of paper food-packaging material contains PCBs and that this can result in migration to food. Where a barrier is used, packaging would be exempt from the tolerances.

The temporary tolerances disclosed in the statement are expected to be finalized by an agency policy statement 30 days after Dec. 21, the day the document went on display.

Noting that the industrial applications of PCBs have become widespread, FDA said they have been used primarily in electrical capacitors, transformer fluids, plasticizers, hydraulic fluids and lubricants and heat transfer fluids. Many of the accidents causing food contamination have arisen from leakages of heat transfer fluids in processing equipment.

PCB residues in milk have occurred, FDA said, because PCB-containing coatings were used as sealants on the inside walls of silos containing dairy feed silage. The use of spent PCB transformer fluid as a herbicide spray vehicle was suspected to have contaminated dairy cattle grazing areas, it was noted.

On possible health effects, FDA said: "The dietary intake of PCBs, as shown in the FDA's total diet studies for the past 2 1/2 years, is of a low order (less than 0.0001 mg per kg of body weight per day in a high consumption diet). There is, however, limited knowledge of the effects of PCBs on human health even at low levels."

PCBs Not Banned In Some Electrical Equipment

FDA recommended that in no case should the daily PCB intake from all food sources exceed 1.4 mg.

The upcoming rule making, FDA said, would include provisions to preclude direct, accidental PCB contamination of animal feed, food, and food packaging materials.

Establishments of various kinds would be expected under the rule making to take a number of actions.

Animal feed establishments were instructed to make certain that coatings or paints on contact surfaces of feed storage areas not contain PCBs. New equipment or machinery for handling or processing feed in and around an animal feed producing establishment "shall not contain PCBs," FDA said, continuing:

> "The management of establishments producing animal feed shall eliminate to the fullest extent possible commensurate with good manufacturing practice the following - - heat exchange fluids formulated with PCBs, any PCB-containing feed contact surfaces and lubricants, and any other PCB-containing materials that reasonably could be expected to cause animal feed to become contaminated with PCBs . . ."

Similar instructions, except for the reference in coatings or paints in feed storage areas, were given for food packaging material establishments and for food establishments. For each type of establishment, FDA said:

> "Electrical transformers and capacitors that contain PCBs are not expected to cause the contamination of food in these establishments and are exempt from the above-mentioned provisions."

However, FDA said, the improper disposal of PCB-containing materials from food and feed and packaging plants could cause further environmental contamination. The agency described "appropriate disposal" as "high temperature incineration (2,000° F. or above for 2 seconds) or other means whereby the PCBs are destroyed or degraded to chemical compounds of harmless composition and nonpolluting properties."

Substitute or replacement chemicals for present uses of PCBs being eliminated may need to possess similar properties, FDA noted, continuing:

> "An exemption to the provisions eliminating certain industrial uses of PCBs will permit the continued use in regulated establishments of certain electrical power equipment containing PCBs. This use of PCBs is considered essential and presents only a minimal risk of accidental contamination of food and the environment."

Noting the existence of an Interdepartmental Task Force on PCBs, FDA said the following governmental groups are represented: Office of Science and Technology, Council on Environmental Quality, Department of Agriculture, Department of Commerce (National Bureau of Standards and National Oceanic and Atmospheric Administration), EPA, Department of Health, Education and Welfare (FDA and the National Institute of Environmental Health Sciences) and Department of Interior.

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THE PRESENT STATE OF AFFAIRS: NOT ALL THE ACTION IS AT EPA

(No. 4 in a Series of Backgrounders for New Subscribers)

While the Environmental Protection Agency has major responsibilities for the regulation of pesticide use and development, other federal agencies still will be in the act, and State governments can be expected to become increasingly important in the regulation of day-to-day manufacture and use of pesticides and industrial chemicals.

Meanwhile, Congress looks anew at proposals which would expand regulation as the legislative session begins. It never goes the other way.

An illustration of the latter point is the so-called Toxic Substances Act which came within inches of enactment in the last session. Under this proposal, producers of potentially toxic substances would have to register them with EPA, which then would formulate rules for their testing and use in a manner that would protect the safety of individuals and the environment.

The appearance of the industrial chemical, polychlorinated biphenyls, and, more recently, the phthalate plasticizers, in surprising places in the environment and food chain has given impetus to the legislation. Probably the only thing