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Author

Corporate Author

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DRAFT VA DIOXIN STUDY SAYS VA CAN'T BE CERTAIN OF TCDD SOURCE IN VETERANS

A Veterans Administration's (VA) study of TCDD in the body fat of veterans concludes the VA can't be certain of the source of dioxin found in any of the men in the study (See May 14, Page 18). It stated:

"The data indicate that TCDD can be found in some persons who report exposure to Herbicide Orange and in others who were never in Vietnam and know of no contact with the herbicide. On the other hand, some veterans from Vietnam have no detectable TCDD and the same is true of veterans who were never in Vietnam...Information regarding pre- and post-service exposure to chemicals that contain TCDD is too inadequate to allow more than speculation on other sources of the material in the fat samples. TCDD has been found in a substance other than Herbicide Orange or the 2,4,5-T in that mixture. It is impossible, therefore, to be certain of the source of TCDD found in any of the men in this study."

The unpublished draft is being sent to the White House, the National Academy of Science's National Research Council and the Office of Technology Assessment for review by the VA's Dr. Lawrence B. Hobson, Deputy Assistant Chief Medical Director for Research and Development. The findings in the VA report included:

"Of the twenty veterans from Vietnam, seven had no detectable TCDD with a limit of detection at 2 p.p.t. to 4 p.p.t.; another two had detectible material that could not be validated as TCDD and one could be considered equivocal because the measured value was so low as to be questionable. The ten remaining men had TCDD identified and measured in amounts from 3 p.p.t. with a limit of detection of 2 parts to 96 or 100 p.p.t. with 10 parts limit of detection.

The VA study also said that out of 10 veterans unexposed to the herbicide, two had TCDD identified in their fat at 5 p.p.t. and 6 p.p.t.

Another finding reported by the VA was that out of three Air Force officers known to have been exposed to TCDD, one had no identified TCDD in his fat while the other two had TCDD in the fat at levels between 12 p.p.t. and 96 p.p.t.

The draft also indicated the study failed to establish a cause-effect relationship between exposure to TCDD and health problems. It said:

"Three of the seven veterans who reported difficulties while in Vietnam had no TCDD detected; the four others had 5 p.p.t. to 96 p.p.t. Of the three men whose medical complaints were difficult to relate to toxic substances, three had no TCDD and three had 5 to 96 p.p.t. The category of five veterans with mental problems included two without detectable TCDD and three whose assay results were 5 to 13 p.p.t. One of the three veterans reporting reproductive problems had no detected TCDD and the other two had levels of 3 p.p.t. and 7 p.p.t."

It added: "Because of the difficulty and limited availability of the assay techniques, the necessity for securing large fat samples, and the uncertainty of the source of the TCDD detected, the method described here does not seem a satisfactory routine test for exposure to Herbicide Orange nor acceptable evidence of contact with that specific

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defoliant nor the absence of such contact."

Additionally, the VA study said the amounts of TCDD measured in the fat were "very small," not exceeding 100 p.p.t.

EPA'S FINAL HAZARDOUS WASTE RULES PUBLISHED IN FEDERAL REGISTER

EPA's final hazardous waste rules with listings covering generators, transporters, facilities and permits were published May 19 in the Federal Register (See May 14, Pages 28 & 29). The regulations are effective Nov. 19 except for parts of the rules that were re-proposed.

Comments on the regulations will be accepted by EPA until July 18, according to the notice. EPA will also hold three public meetings on the rules. The dates and locations of the meetings are:

May 30--Sheraton Palace Hotel, 639 Market Place, San Francisco, Calif.

June 2--HEW Auditorium, HEW North Building, 300 Independence Ave., S.W., Washington, D.C.

June 6--Palmer House Hotel, 17 East Monroe St., Chicago, Ill.

Comments on EPA's proposal to add eleven wastes to its listing are also due July 18.

The notice said EPA is reproposing its financial responsibility requirements to give hazardous waste facility owners options in choosing trustfunds, surety bonds, letters of credit, guaranties, financial tests and a revenue test for municipalities to provide the necessary assurances for the cost of closure and post closure care. The new proposal also includes a provision requiring liability insurance for interim status.

EPA said it is seeking comments on the proposed liability requirements by July 18 with a public meeting scheduled for July 1. Those comments may include:

"Should the agency require insurance coverage for nonsudden and accidental occurrences during the interim status period? Will the insurance industry provide such coverage?"

"Will such coverage be available on a continuing basis, or may the insurance industry withdraw such coverage in the event of large damage suits?"

"Is the amount of coverage specified in the regulations appropriate?"

"Can we tailor the amount of required insurance to reflect better the degrees of risks posed by the operations of particular sites? How can this be done?"

"What will be the likely annual costs of insurance for nonsudden accidents? Will all firms be able to afford it?"