



# EWK CONSULTANTS INC.

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3 February, 1981

Honorable John Roberts  
Minister  
Department of the Environment  
Ottawa, Canada

Dear Minister:

With respect to the attached article, if it is correct, Hooker's plant is probably not the source of the Lake Ontario TCDD. However, Hooker probably is, in my opinion.

When I was involved in a major law suit against Hooker's parent, Occidental, I tried to track the source of Mirex. I convinced myself at least, that the source was Hooker's leaking landfills, some of which I uncovered, as well as past plant discharges. At that point, 1978, I tried to tell those who would listen that a parallel problem with TCDD potentially existed.

In short, if Hooker is the source of the TCDD in Lake Ontario, look to its landfills as the present source, not the manufacturing plant.

Very truly yours,

Edward W. Kleppinger, Ph.D.

EWK:wm  
Att.

# "Canada Deeply Concerned By U.S. Pollution"

St. Louis Dispatch 1-2-81

(This article also appeared in the Atlanta Constitution Journal)

By Edmund Gross

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IN A RECENT conversation with journalists, Canada's minister of environment, John Roberts, asserted that the Canadian government is considering suing the United States over Washington's failure to respond to Canada's deepening concerns about pollution from the U.S.

If the U.S. continues to ignore Canadian requests, Roberts added, "perhaps the only thing to do is to send the Mounties in to raid Washington."

Such statements by various ministries and an increasing number of press reports recently have highlighted the escalating frustration of Canada over lack of U.S. response to its concerns about pollution from the south.

One major immediate threat is the dumping of toxic wastes—specifically the deadly chemical dioxin—in the Niagara River of New York State and in Lake Huron, just off Saginaw Bay in Michigan.

The Canadian Environmental Ministry reported recently that dioxin was found in herring gull eggs in 12 different locations in the Great Lakes Basin. Manufacture of this particular component of dioxin, TCDD, is continuing at the Dow Chemical plant on the Saginaw River at Midland, Mich., according to the government; Dow denies responsibility. But scientists here continue to question the integrity of the waste system at Dow.

IN ADDITION, dangerous levels of TCDD were discovered in Lake Ontario. If officials lay the cause of dioxin in Lake Huron at the doorstep of Dow, they admittedly are hard-pressed to identify the cause of dioxin in eastern Canada.

The Hooker Chemical Co. of upstate New York, which used to manufacture the pesticides, halted its production five years ago. The company says its plant could not possibly be the source of dioxin found in Lake Ontario. Although the government lacks proof, it suspects that current manufacturing agents at Hooker find their way into nearby stream sediments and are carried into the Niagara River and from there into Lake Ontario.

Roberts echoed this view in a recent public statement.

The Canadian External Affairs Ministry already has expressed its concern to Washington over the penetration of dioxin in the Great Lakes. Following this up, Roberts urgently requested the U.S. to undertake an immediate investigation of all present manufacturing methods involving chemicals that add to Canada's increasing environmental stress.

The Environmental Ministry plans to host a world conference on dioxin. Meanwhile, Roberts has assured Canada's citizenry that his principal concern is to safeguard the health of all people drinking the water of the Great Lakes.

OFFICIALS COMPLAIN privately that Washington and a few state governments, notably New York's, are dragging their feet on the thorny issue. The Canadian government claims it has received hundreds of letters from American citizens, including state legislators, urging Canada to prod U.S. governments into action on environmental problems affecting both nations. It is further contended that Americans are apparently uneasy that there could be a repetition of the Love Canal disaster of a year ago.

The Canadian Health and Welfare Ministry has planned and organized a conference on dioxin involving U.S. officials. Environmental officials from the U.S. Food and Drug Administration and specialists from the New York State Conservation Department will meet with their Canadian counterparts here to seek ways and means of controlling the deteriorating situation.

If solutions are unduly delayed, policy-makers caution, it may be necessary to close the Canadian side of Lake Ontario to both commercial and sport fishing.

IF DIOXIN can be described as a mounting headache for Canada, then the problem of acid rain fallout from the U.S. that pervades this country is a lingering malaise in almost desperate need of treatment.

Precipitation in various parts of eastern Canada is now 10 times more acidic than so-called "clean" rain. In some areas, it is found to be up to 40 times more acidic.

The basic point is made that most of the acid rain falling across the width and breadth of North America emanates in the United States. About 70 percent of the acidity comes from sulfur dioxide; the remainder from nitrogen oxides. Sulfur dioxide alone produces about 28 million tons of acid precipitation in the U.S.

As in the case of dioxin, it is hardly surprising that the Canadian government is pressing American federal and state authorities to come to grips with the problem.

Canadian officials nod their heads affirmatively when they discuss U.S. federal policies to control pollutants in American cars. But they contend that automobiles play only a minor part in the production of acid rain. And their vocal protests rise several decibels when it comes to the issue of coal-fired thermal plants as the principal factor in the spreading of acid rain.

They look to a joint report of American and Canadian scientists made public in November underscoring that during the past year as many as 4,000 lakes in Ontario alone have died as a result of continuously falling acid precipitation.

IN THEIR ANALYSIS, scientists made clear that all fish in these doomed lakes have perished. And, they warn, hundreds of thousands of lakes in eastern Canada face extinction as supporters of life if some remedial action is not carried out soon by various bodies in the U.S. Acid rain already has destroyed 20,000 lakes in Scandinavia.

The government maintains that it sympathizes with U.S. plans to convert power plants from oil to coal. The fact that coal is much cheaper, they add, should spur company managements to build anti-pollutant devices into the systems that produce electricity.

If this is not done, officials assert, it means that Canada is subsidizing electricity rates for Americans. And this is totally unacceptable, they insist.

Acid rain punishes foliage and soil, reduces crop yields, impairs forest growth and corrodes buildings. Acid rain is responsible for minerals or heavy metals in the earth flowing out of the soil and running into lakes and streams; in some cases, aluminum has been found to coat the gills of fish, thereby strangling the fish.

LUMBER is Canada's largest industry. About 10 percent of Canada's work force is employed in the lumber industry and lumber accounts for 25 percent of all Canadian exports. Experts assert that continuing acid rain definitely slows down the growth of trees by changing the acidity of the soil.



February 23, 1981

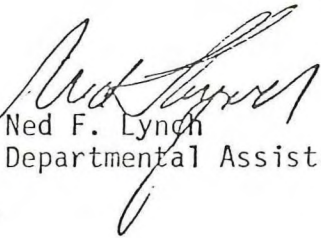
Dr. Edward W. Kleppinger  
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Dear Dr. Kleppinger:

On behalf of the Honourable John Roberts, I wish to acknowledge receipt of your February 3 letter and enclosed copy of an article, referring to Hooker Chemical Co. as a source of the TCDD in Lake Ontario.

The Minister is aware of your views on this issue and would like to thank you for bringing them to his attention.

Sincerely,



Ned F. Lynch  
Departmental Assistant



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Dr. Edward W. Kleppinger  
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Dear Dr. Kleppinger:

Thank you for your letter of February 3 regarding sources of TCDD in Lake Ontario.

I am aware of numerous recent reports which have been prepared over the last two years by various organizations on this subject and my officials maintain regular and effective contact with the New York State Department of Environmental Conservation and the Environmental Protection Agency.

We are encouraged that remedial work at Love Canal is almost complete and that work will hopefully begin soon at the Hyde Park dump site. A number of other sites have been identified as containing large quantities of 2,4,5-Trichlorophenol wastes from which TCDD is now leaching.

Canadian and United States officials met in Washington in December, 1980, to develop an effective response to the problem, and we are hopeful of progressive improvement.

Yours sincerely,

John Roberts