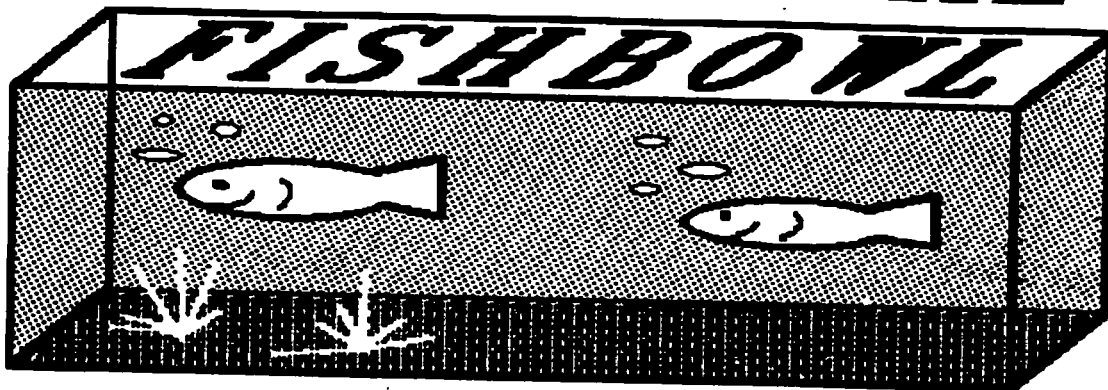


INSIDE THE



NATIONAL FEDERATION OF FEDERAL EMPLOYEES
P. O. BOX 76082
WASHINGTON, DC 20013
OFFICE: ROOM 302 NE MALL
NFFE
EPA HEADQUARTERS' PROFESSIONALS

LOCAL 2050
(202) 382-2327 or
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APRIL-1989

VOLUME 5--No. 4

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LOCAL 2050

JOIN TODAY -

"We must conduct our affairs at EPA as if we worked inside a fishbowl--"
William Ruckelshaus, Former Administrator, U. S. EPA

FISHBOWL STAFF

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BOB CARTON
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RAYMOND LOCKE**



NFFE SOLICITS COMMENTS ON PROPOSED CODE OF ETHICS

Last year, NFFE proposed a code of ethics for inclusion in the collective bargaining agreement. It contained ethical principles to which professionals should adhere when carrying out or managing professional work, and a mechanism to identify possible instances of ethical misconduct and to refer issues for investigation and remediation. The need for this code came out of a number of cases of possible scientific fraud, plagiarism, etc., that have been observed by NFFE over the years. When the Inspector General's office was approached with a specific instance of scientific fraud here at Headquarters, NFFE representatives were told: (1) the IG's office has no expertise in this area, and (2) there were no criteria upon which to judge violations of professional ethics.

Out of this experience, NFFE developed the proposed code of ethics which follows. Not described are our proposals for implementing this code which includes an Ethics Panel to determine on a case by case basis whether issues brought before them are merely differences in professional opinion or are actual ethical violations. The procedures also contain methods for resolving differences in professional opinions. We are now soliciting comments from any member of the bargaining unit (any professional) on this code. Once comments are in (deadline is May 15, 1989), we will hold a general meeting to discuss them, followed by a vote of union members. Keep your eye out for notices. A complete copy of the proposal can be obtained by calling the Union office (382-2383) or by calling Bob Carton (382-2325).

PROPOSED CODE OF ETHICS GOVERNING PROFESSIONAL WORK

Professionals must:

1. Honestly represent their credentials when applying for jobs, or accepting or undertaking new assignments.
2. Seek to understand the letter and spirit of the law(s) under which their program operates, and conduct every aspect of their work in conformance with Congressional intent.
3. Refuse to cover up or suppress information germane to the protection of the public health or the ecosphere (environment), or to encourage others to do so.



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4. Respect and acknowledge the intellectual property of others, and accurately present the data and opinions of others.
5. Ensure that work for which they were responsible does not involve dishonesty, fraud, or deceit; and that there is adequate quality control of work done for them by contractors.
6. Honestly represent the quality and uncertainty of their analysis, given the constraints of the available resources, so that management is aware of its limitations.
7. Ensure that the integrity of the peer review process is not violated.
8. Immediately expose any misrepresentation of work they performed, that was performed under their direction, or for which they had contractual responsibility, with respect to plagiarism and/or scientific or technical fraud, as soon as they are aware of these violations.

ADMINISTRATOR'S GENERAL STAFF MEETING ENCOURAGING

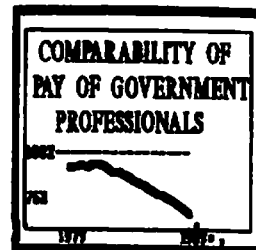
Administrator Reilly's EPA Headquarters General Staff Meeting of March 21st was quite encouraging in many respects. The Administrator's remarks were complimentary to the staff and contained the exposition of many worthwhile goals for EPA's future attainment. In addition to the fact that many employees were also heartened by what appeared to be a commitment to attempt to avoid the "Navy Yard site" for the new EPA Headquarters building, the substance of Mr. Reilly remarks reflected both commitment and insight into the important environmental issues of the day. NFFE Local 2050 is firmly committed to the same environmental goals, and very much looks forward to working in a problem-solving manner with EPA's new Administrator to attain them.

NFFE MEETS ONCE AGAIN WITH REILLY'S CHIEF OF STAFF

NFFE President-Elect, Dr. Bob Carton, and Vice-President, Dr. Rufus Morison, met with Gordon Binder, Mr. Reilly's chief of staff on April 12th in a follow-up to the March 7th meeting. The principal subject was NFFE's response to the Science Advisory Board's (SAB's) "Future Risk..." document (see response elsewhere in this issue). The major thrust of NFFE's response is that planning and analysis of Agency research programs should involve the highly trained and experienced staff. The Union asked that, in order to better integrate staff scientists' views in research and programmatic matters, the Agency consider a major change in management style by implementing a participatory management program throughout Headquarters. Binder noted that the idea had been bouncing around for some time in the West Tower and suggested NFFE pursue the idea with the appropriate office. Carton promised to submit proposals for the Agency's consideration.

NFFE representatives also noted that unwarranted investigations of union officials were being undertaken by the I.G.'s office. Binder suggested raising this issue with the IG, Mr. Martin, or with the Office of Special Counsel, Merit System Protection Board. (see related story in this issue).

The 4-phenylcyclohexene ("4-PC") carpet poisoning of EPA employees was raised by NFFE representatives as a "National Issue" of major proportions. They noted that NFFE has received numerous phone calls and letters from individuals and organizations around the country asking what could be done to get EPA to act. Carton noted that the Office of Toxic Substances was about to conduct an assessment of the problem and asked that the Administrator be briefed on this subject in order to see first-hand how the Agency conducts investigations on chemical incidents. Binder suggested briefing Linda Fisher, the AA-designate for the Office of Pesticides and Toxic Substances, on the subject.



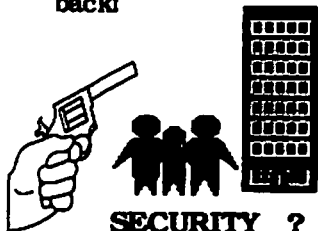
ONE CASE FOR HIGHER PAY FOR EPA'S PROFESSIONALS

In an article entitled "The First International Salary Survey for Toxicologists," to be published in the September issue of the Journal of the American College of Toxicology, Dr. Shayne C. Gad demonstrates that toxicologists employed by the U.S. Government are poorly paid with respect to their colleagues in state and local governments, academia, contract laboratories, and industry.

A survey form, reviewed by both the American College of Toxicology and the Society of Toxicology, was sent to toxicologists on the mailing lists of national and regional professional organizations [Society of Toxicology, including all 15 regional chapters; American College of Toxicology; American Board of Toxicology; Society of Environmental Toxicology and Chemistry (SETAC); Association of Government Toxicologists; Canadian Society of Toxicology; Environmental Mutagen Society (EMS) and the Teratology Society.] The survey requested salary information in relation to level of academic training, years of experience, certification in toxicology, gender, and locale and type of employer. To assure confidentiality, the survey forms were returned to the American College of Toxicology, where they were removed from mailing envelopes and sent to the author. The overall response rate for the survey was 35.5%, with 2,240 completed surveys received.

Although the reader should consult the complete article for more specific information, it is discouraging to note that at the doctoral level with from 1 to 20 years of experience, toxicologists employed by the U.S. Government were at the very bottom of the salary scale. For example, with 5-10 years of experience, salary ranges were as follows: U.S. Government, \$45,300; academic, \$46,700; contract laboratories, \$49,000; state and local government, \$51,100; consulting firms, \$57,300; other industry, \$58,300; consumer products industry, \$61,000; chemical industry, \$61,100; and pharmaceutical industry, \$64,000. This, of course, does not include bonuses which toxicologists working in the private sector frequently receive in addition to salary.

It is no wonder that EPA, as well as other U.S. Government agencies, are finding it very difficult to recruit toxicologists and other professionals in all disciplines! In the past, job security and fringe benefits were often used to explain the compensation differential between the Federal Government and private industry. Both the job security and fringe benefits previously associated with Federal employment have been seriously eroded over the past decade, and, it appears will continue to worsen. If the Federal Government wishes to attract a competent professional work force in the future, it has to face the economic fact that Federal wages must keep pace with the private sector. As Administrator Reilly has said, EPA is blessed with many extremely motivated and sacrificing professionals; however, no matter how dedicated, mortgages have to be paid, children must be sent to college, and everyday living expenses must be met. These very real expenditures cannot be met with kind words and a pat on the back!



UPDATE ON EMPLOYEE SECURITY NEGOTIATIONS

Employee security negotiations between EPA and NFFE Local 2050 have resulted in nine proposals which are close to agreement as shown below:

SECURITY ?

1. All arrest reports and incident reports filed with EPA involving bargaining unit employees shall be provided by EPA to the Union President or his designate within 48 hours of the incident. Also all arrest reports and incident reports filed with EPA involving non-bargaining unit employees shall be provided by EPA, after removing the names, to the Union President or his designate within 48 hours of the incident.
2. All bargaining unit employees shall receive monthly from EPA, through individual mail delivery and posting on all lockable bulletin boards, a complete crime statistics

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monthly summary for the EPA Headquarters buildings and adjacent areas for the previous month.

3. The EPA shall provide and publicize two emergency numbers for reaching the guard service in the telephone directory and on stickers for bargaining unit employee phones. The second number should be an emergency number manned 24 hours a day for use when the guards' phone number is ringing busy or is not answered.
4. The Agency shall distribute not less than annually stickers with updated emergency numbers for guards and the health unit to bargaining unit employees. New phones will be installed with the stickers affixed.
5. When EPA exercises its legal right to search a bargaining unit employee's possessions at the work site (e.g., desk, locker, car, clothing, etc.) in a non-criminal matter including Confidential Business Information (CBI) regulations or EPA CBI violation(s), the employee will be allowed to be present during the search and the Union President or his designate shall be notified by EPA so that he or his representative can be present during the search provided that the supply of such representation by the Union shall not unduly delay the search or impede the purpose for which the search is conducted and the Union representative possesses the required clearances.
6. EPA management or its agents shall provide timely escort service to areas defined in the guard contracts for bargaining unit employees.
7. EPA shall provide adequate security to all bargaining unit employees.
8. If management determines any EPA Headquarters facilities are to remain open for extended periods of time, then management should take necessary steps to provide for the protection of bargaining unit employees and for property located within these areas.
9. Searches of personal belongings or of bargaining unit employee's possessions (e.g., desk, clothing, cabinets) shall be permitted only on basis of reasonable suspicion, based on specific objective facts and reasonable inferences drawn from those facts.

EPA declared many other proposals as non-negotiable. The Union appealed eleven of these to the Federal Labor Relations Authority on March 20, 1989. Four new proposals were also presented by the Union to EPA on April 4th. These included adding Metro stops to the shuttle bus runs, EPA's maintaining a list of next of kin in case of an emergency, distributing Security Bulletins at least quarterly to EPA bargaining unit employees (EPA officials only wanted to distribute it semi-annually), and maintaining a forum for sharing information between the Union and management concerning security, safety, ventilation and other working conditions. EPA has not responded to these latest proposals to date.

The Union is also seeking guards for the Fairchild Building and panic buttons to alert the police department of serious problems as part of settlement negotiations involving an Unfair Labor Practice complaint issued by the FLRA against EPA for opening the stairwells in the Fairchild Building without impact bargaining with the Union.

Crime statistics for the Fairchild Building before and after the stairwells were opened have been compiled by the Union as shown in Table 1. The increase in crimes since the stairwells were opened is evident. Some offices have even installed more combination locks because of the number of thefts and unauthorized entries into the building.

EPA officials are meeting with the management of the Fairchild Building to discuss the guards and panic buttons in the near future. Another hearing is scheduled for April 21st with the FLRA if this matter can not be resolved between the two parties.

TABLE 1

CRIME INCIDENTS FOR THE FAIRCHILD BUILDING AS REPORTED BY EPA

DATE	NUMBER OF CRIMES REPORTED
1/1/88 - 1/31/88	1
2/1/88 - 2/29/88	1
3/1/88 - 3/31/88	0
4/1/88 - 4/29/88	2
5/1/88 - 5/31/88	1
6/1/88 - 6/30/88	2
7/1/88 - 7/29/88	2
8/1/88 - 8/29/88	2

STAIRWELL DOORS UNLOCKED ON 9/6/88

9/1/88 - 9/30/88	Not reported
10/3/88 - 10/31/88	1
11/1/88 - 11/30/88	4
12/1/88 - 12/30/88	4
1/3/89 - 1/31/89	9
2/2/89 - 2/23/89	6
3/1/89 - 3/28/89	2



UPDATE ON INVESTIGATION OF THE INSPECTOR GENERAL

John A. Moore, Acting Deputy Administrator, has formally requested the Office of the Special Counsel (OSC), Merit System Protection Board, to review allegations of impropriety against EPA's Inspector General (IG), John C. Martin, made by two employees of the IG's office. In a letter dated April 5, 1989, Dr. Moore requested that the OSC review the allegations to determine if "you want to assert jurisdiction over these matters." He cited the ongoing investigation of the IG and "EPA's reluctance in any way to be perceived as interfering" with this investigation as reasons for his request. Some of the documents forwarded by Dr. Moore were: "Scandals in the EPA Office of Inspector General," submitted by the two inspectors, and an unsolicited reply prepared by John Martin and sent to the Administrator's office. In a separate letter to the two employees of the IG's office, Dr. Moore noted that he was acting, in part, on advice of C. Boyden Gran, White House Counsel.



COMMENTS OF NFFE LOCAL 2050 ON
"FUTURE RISK: RESEARCH STRATEGIES FOR THE 1990's"

EPA's Science Advisory Board's report, "Future Risk: Research Strategies for the 1990's," is an important document, and NFFE appreciates the opportunity to comment on it.

First, the general themes of the document, i.e., shifting from pollution control to pollution prevention and anticipating future environmental problems, are moves in the right direction, but we must recognize that research leading to new knowledge--whether long-range basic research or research undertaken to support programs--is no panacea for environmental problems. No amount of new knowledge will ameliorate environmental problems without someone applying that knowledge, and applying knowledge to environmental problems is loaded with political "dynamite." Witness the knowledge now available about acid rains, urban ozone levels, and global warming, and the timidity with which that knowledge is handled in the political arena where application and action must take place. This is, economics usually dominates environmental decision-making, regardless of the state of ecological knowledge.

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So care must be taken that expectations are not falsely raised for amelioration flowing from increased research spending to produce increased knowledge. It is important in this regard to recognize that there is a third theme for research in the 1990's: the interplay between ecology and economics.

The need for developing a sound strategy for achieving "Future Risk's" stated goals (and the one we suggest be added) via a focal point such as the Research Strategies Council (RSC) is clear, but the mechanism for developing specific proposals and achieving consensus on them is not well articulated. We agree with the call for involvement of EPA scientists and those in academe and industry in developing proposals for the RSC's consideration. In this regard, we wish to emphasize most strongly that EPA's program office scientists, as well as those in the laboratories, have a role to play in this endeavor.

EPA's program office scientists, many of whom have a wealth of research experience in academe and industry in addition to insights gained working "in the program trenches," have not been involved nearly enough in research planning and consensus-building. We caution against the inclusion of non-scientist program managers/supervisors in research strategy consensus-building for the very reasons alluded to in "Future Risk." That is, such individuals, who have no background in research but much program authority and responsibility, are the very people most likely to stay narrowly focussed on short-term, "fire-fighting" laboratory projects, and to lose sight of longer-range, basic research goals.

Until consensus is reached (on research goals and the mechanisms for translating new knowledge into ameliorative action), we think the proposal to commit Agency political capital toward trying to double the Office of Research and Development's budget over five years is premature. Couched in industrial/economic terms, one would not propose to the board of directors to double a chemical plant's capacity before the need for additional capacity was established and the engineering plans for the increase were shown to be feasible. But, clearly, funding patterns over the past several years have not been conducive to thinking about significant shifts in Agency research directions, especially toward basic and long-range research goals.

Regarding the suggestion to create an EPA Office to anticipate environmental problems, we think such an office is unnecessary. Anticipating environmental problems should be a normal function of EPA scientists, and that function merely needs to be recognized and encouraged by management.

A mechanism for eliciting that sort of information from EPA scientists must be established. Toward this end and toward the end of engaging EPA scientists more completely in the Agency's business (as Mr. Reilly suggested on March 21st), we strongly recommend establishment of cooperative management, or "quality circles" at EPA.

This approach would invest and engage the Agency's science staff in both the research and the programmatic science components of EPA's business in a way not heretofore done. We believe that no other single action on Administrator Reilly's part could do more to upgrade the Agency's productivity, stature, and credibility. First-class scientists would again be attracted to EPA as a place where scientists play a significant role in the Earth's environmental affairs--instead of the present situation.

We agree with "Future Risk's" recommendation to upgrade the skills of EPA scientists through programs of sabbatical leave, etc., and exchanges with industrial and academic institutions. We again point out, however, the program office scientists, as well as laboratory scientists, should be included in such programs for the full benefit to EPA to be realized.

It is in the "program trenches," after all, that environmental knowledge is translated into environmental action.

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(Union scientists contributing most to this commentary sent to EPA's Science Advisory Board included Drs. Robert Carton, Rufus Morison, Daljit Sawhney, Hale Vandermer, James Murphy, William Hirzy, and Ms. Eleanor Carney. NFFE Local 2050 has offered to meet with the Science Advisory Board at any time to expand upon the Union's comments.)

TWO UNFAIR LABOR PRACTICE CHARGES AGAINST MANAGEMENT SETTLED

On the day set for trial, April 7th, two unfair labor practice charges by the Federal Labor Relations Authority (FLRA) against EPA were settled by negotiation. A third charge was re-scheduled for trial pending outcome of attempts by management to comply with Union demands to up-grade security at the Fairchild Building, and a fourth charge went to trial that day.

The charge that was tried involved attempted intimidation of a professional employee by his section chief who threatened to "get him" if he continued in his efforts to obtain relief through the negotiated grievance procedure. The supervisor denied ever trying to intimidate the employee, yet had no good explanation for why he called the employee into his office after the intimidation attempt and read a "for-the-record-statement" to him aimed at rescinding the intimidating remarks. The Administrative Law Judge is expected to render a decision within 6 to 8 months.

The charge put on hold involves opening stairwells at the Fairchild building without consulting the Union on employee concerns about security. An analysis of crime statistics by Chief Steward Eleanor Carney shows a dramatic increase in crime incidence at Fairchild since the stair wells were opened without adequately up-grading security (see related story in this issue). The Union wants, in addition to guards in the lobby and garage entrances checking identification, a "panic button" that will summon armed help from the police or Federal Protective Service (FPS) if needed. The Union has several other security up-grade proposals that are the subject of a negotiability appeal (EPA does not want to put these measures in place), and a decision from the FLRA on the appeal is expected within several months.

The charges settled involved failure by management to provide information on human resources councils (HRC's) and refusal by management to comply with the negotiated grievance process (failure to establish hearing panels for Step 3 of the process). In the settlements, EPA agreed to provide the HRC information, to establish Step 3 panels in conformity with the contract, to permit unrestricted use of Inside the Fishbowl to convey information on the importance of the Union for protecting employee rights (which the Agency has heretofore called "recruitment"), and to re-open negotiations on access to bulletin boards for employee and Union use.

RITTER AND CARNEY DEPART FOR GREENER PASTURES

This month two Union officers, Chief Steward Eleanor Carney and Vice-President Dave Ritter, leave the Agency. Dave, who has been a Vice-President for four years, handling Crystal City affairs and new building liaison with management, is a toxicologist who is taking early retirement and will be continuing his professional work "on the outside." Dave has also been the keeper of the computerized mail list, responsible for the much improved communications via the Fishbowl, along with Kryz and Ray Locke. We will miss his enthusiastic, cheerful, and competent efforts in all the areas he handled so well.

Ellie, "the Tigress of 2050," is moving with her husband to Florida, where she will be City Engineer in Pompano Beach, and surely as big a success there as she was here for both the Union and the Agency. She has been responsible, more than any other single person, for the Union's progress in enlightening the Agency on its obligations to deal with the Union as the law prescribes. The fact that this issue contains a solicitation for membership, clearly stating the importance of dues-paying, full-voting membership, is due to her efforts. Even more important is Ellie's record of determination to improve the security of our workplace after the murder of Linda

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Billings. To the extent that security at Headquarters has improved over the past two and a half years, Ellie Carney deserves at least 90 percent of the credit, and all EPA employees should know this.

We will miss these dedicated, hard-working professionals, who have given so freely of their own time and resources for the benefit of EPA employees. This workplace will be poorer for their leaving, but now others will have the benefit of their acquaintance.

THE UNION AND HUMAN RESOURCE COUNCILS (HRC's)

by Bill Hirzy

(This article is the first of a series explaining the roles of the Union and of HRC mini-councils.)

What is the relationship between the Union and HRC's? Why should you shell out the equivalent of one lunch at Roy's per week to support the Union when HRC's give you "all you need?" Isn't a union redundant with HRC's around? Good questions! Here are some good answers.

When was the last time an HRC testified on the Hill about the erosion of professionalism through contracting out of our work? When was the last time an HRC took a stance (public or "in-house") regarding employee health problems? When was the last time an HRC defended an employee being harassed by management? When was the last time an HRC was solicited by Congress for its opinion on anything at all? When was the last time an HRC took any position on anything in opposition to the "party line?"

The point is not that HRC's are useless—they're not. But they have a different reason for being than the Union. HRC's are management organizations, created, run, and tolerated by management, capable of and willing to further management concerns, but quite limited in their willingness and in power to deal with employee advocacy issues. Those areas—employee advocacy areas—are the Union's strengths, in both will to act and power to do so.

HRC Chairs report to management—the Union, by law, reports to you. Membership on HRC's is at management's whim—membership and governance of the Union, by law, is your free choice. HRCs cannot bargain with higher management over changes in working conditions—the Union can, and by law upper management must bargain with only the Union on these matters. Friends of the Civil Service and the environment outside EPA can count on the Union for honest, accurate, forthcoming opinions on matters "inside the fishbowl"—they don't and can't rely on HRC's.

Forums where management and employee advocates can meet and work together for the betterment of this work environment are clearly desirable. Let's face it, most of our line managers are every bit as dedicated to EPA's mission as the professional staff—we have no exclusive lock on that. So bringing the intellectual resources of staff and this line management to bear on environmental and work problems just plainly makes a lot of sense.

Some form of "participatory management," of which HRC's are one very primitive form, has been a goal of the organizers of the Union for a long time. What we need now is evolution to a higher form, one in which the employees' legally elected representatives have a more active, responsible role, a role in consonance with our legal rights. But in order for that to be, a substantial increase in the dues-paying, full-voting membership of Local 2050 is needed.

For every work unit there should be a HRC-like organization with full voting, professional and non-professional (as well as management) employee members elected through the legally mandated structure of the unions, which are controlled only by you, the employees of EPA Headquarters. These organizations could be chartered to

handle a much wider range of issues than present HRCs--equitable resource allocations among staff, work and leave scheduling, program management, ethical questions, etc. Clearly we are a long way from that ideal, but with a pilot program or two, we could start to move in this direction, and the Union has plans under development for such a program.

If you think the public's dim view of EPA's accomplishments over the past decade or so must be reversed by action, if you think we must and can overcome the lethargy infecting much of this workplace, then join the Union in this work.

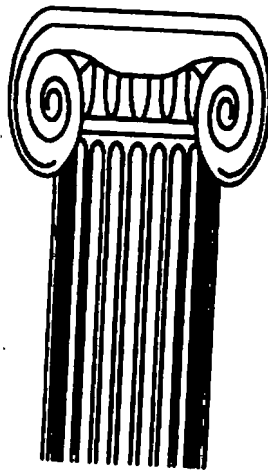
Voting, working membership in the Union costs one lunch at Roy's per week--think about it. We need each other; there is so much that should and can be done if we work together for each other. If not us, who?. If not now, when?

UNION ELECTION SET FOR MAY 25; NOMINATIONS CLOSE MAY 4

Members of Local 2050 have received notice by mail of the annual election set for May 25. Nominations for President-Elect, Secretary, Treasurer, Chief Steward and six Vice-Presidents will close at noon on May 4. EPA professionals who are members in good standing in the Local may nominate themselves or another member in good standing for these offices. If you are not yet a member, you may join any time before the election and participate fully. Fill out and send in the SF-1187 dues deduction/membership form or call any Union officer for information on joining.

Non-members of the professional bargaining unit are also cordially invited to join the UNION. While the Union's right to contractually protect employees outside the bargaining unit is limited, all employees who support the goal of improving the work environment through workplace democracy and free speech have a natural home in Local 2050, whether as Regular or Associate member. Please pass this issue of the Fishbowl along to your officemates.

CURRENT NFFE LOCAL 2050 OFFICERS



PRESIDENT:
PRESIDENT-ELECT:
VICE-PRESIDENTS
NFFE - HOTLINES
382-2327
and
382-2383

SECRETARY:
TREASURER:
CHIEF STEWARD:

BILL HRZY 382-2327
BOB CARTON 382-2325
RUFUS MORISON 382-4273
MARK ANTELL - 382-2878
JIM MURPHY 382-7591
DAVID RITTER 557-7375
CHARLIE GARLOW 475-7068

LOIS DICKER 382-3387
DALJIT SANNHAY 382-4289
ELEANOR CARNEY 475-7181

COMPLETE SECTIONS MARKED "X"

REQUEST FOR PAYROLL DEDUCTIONS FOR LABOR ORGANIZATION DUES

Privacy Act Statement

Section 5525 of Title 5 United States Code (Allotments and Assignments of Pay) permits Federal agencies to collect this information. This completed form is used to request that labor organization dues be deducted from your pay and to notify your labor organization of the deduction. Completing this form is voluntary, but it may not be processed if all requested information is not provided.

This record may be disclosed outside your agency to: 1) the Department of Treasury to make proper financial adjustments; 2) a Congressional office if you make an inquiry to that office related to this record; 3) a court or an appropriate Government agency if the Government is party to a legal suit; 4) an appropriate law enforcement agency if we become aware of a legal violation; 5) an organization which is a designated collection agent of a particular labor organization; and 6) other Federal agencies for management, statistical and other official functions (without your personal identification).

Executive Order 9397 allows Federal agencies to use the social security number (SSN) as an individual identifier to avoid confusion caused by employees with the same or similar names. Supplying your SSN is voluntary, but failure to provide it, when it is used as the employee identification number, may mean that payroll deductions cannot be processed.

Your agency shall provide an additional statement if it uses the information furnished on this form for purposes other than those mentioned above.

1. Name of Employee (<i>Print—Last, First, Middle</i>) X	2. Employee I.D. Number (<i>SSN or Other</i>) X	3. Timekeeper Number X _____
4. Home Address (<i>Street Number, City, State and ZIP Code</i>) X	5. Name of Agency (<i>Include Bureau, Division, Branch or Other Designation</i>) X	

Section A—For Use By Labor Organization

Name of Labor Organization (*Indicate Local, Branch, Lodge or Other Appropriate Identification*)

NATIONAL FEDERATION OF FEDERAL EMPLOYEES LOCAL 2050

I hereby certify that the regular dues of this organization for the above named member are currently established at \$ 5.25 per (biweekly) pay period) (calendar month). (*Strike out whichever period is not appropriate, based on arrangement with the employee's agency.*)

Signature and Title of Authorized Official	Date (<i>Month, Day, Year</i>)
--	----------------------------------

Section B—Authorization By Employee

I hereby authorize the above named agency to deduct from my pay each pay period, or the first full pay period of each month, the amount certified above as the regular dues of the (Name of Labor Organization) _____ and to remit such amount to that labor organization in accordance with its arrangements with my employing agency. I further authorize any change in the amount to be deducted which is certified by the above named labor organization as a uniform change in its dues structure.

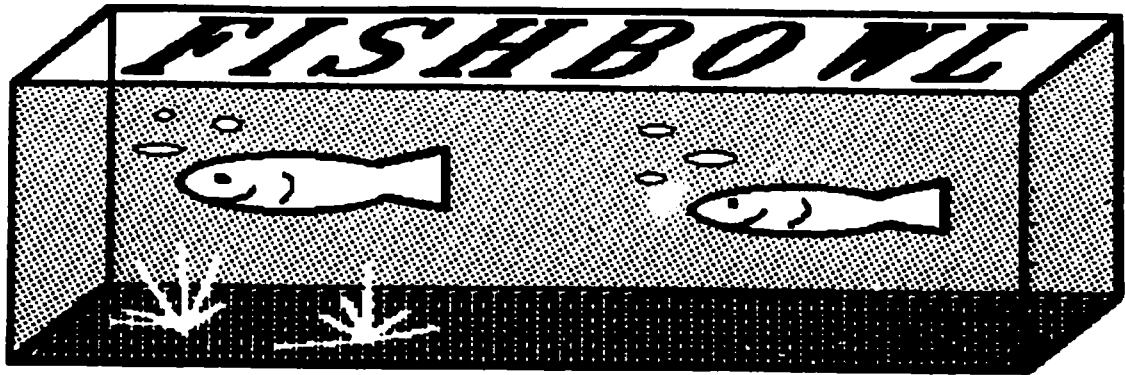
I understand that this authorization, if for a biweekly deduction, will become effective the pay period following its receipt in the payroll office of my employing agency; and that, if for a monthly deduction, it will become effective the first full pay period of the calendar month following its receipt in the payroll office of my employing agency. I further understand that Standard Form 1188, Cancellation of Payroll Deductions for Labor Organization Dues, is available from my employing agency, and that I may cancel this authorization by filing Standard Form 1188 or other written cancellation request with the payroll office of my employing agency. Such cancellation will not be effective, however, until the first full pay period which begins on or after the next established cancellation date of the calendar year after the cancellation is received in the payroll office.

Signature of Employee X	Date (<i>Month, Day, Year</i>) X
--------------------------------	---

FOR COMPLETION BY AGENCY ONLY—The above named employee and labor organization meet the requirements for dues withholding. (Mark the appropriate box. If "Yes", send this form to payroll. If "No", return this form to the labor organization.)	YES	NO

Robert J. Carton
TS-778
TS-796

INSIDE THE



NATIONAL FEDERATION OF FEDERAL EMPLOYEES
P. O. BOX 76082
WASHINGTON, DC 20013
OFFICE: ROOM 302 NE MALL
EPA HEADQUARTERS' PROFESSIONALS

NFFE

LOCAL 2050
(202) 382-2383

"We must conduct our affairs at EPA as if we worked inside a fishbowl—"
William Ruckelshaus, Former Administrator, U. S. EPA

MAY--1989

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WEDNESDAY, JUNE 7TH, 12 NOON TO 1 P.M., ROOM 103 N.E. MALL


LOCAL 2050

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CONGRESS SOLICITS UNION VIEWS ON CABINET STATUS AND OMB



Local 2050 was invited by two House Subcommittees to testify on the Office of Management and Budget's (OMB's) influence on employee morale at EPA and on the proposed elevation of EPA to cabinet status. Watch for a separate mailing soliciting your comments on cabinet status. A summary of the proposed enabling legislation will be included in the mailing. The Union wants to reflect bargaining unit employee views on this important topic.

Following the recent revelation of OMB's changing the scientific content of Congressional testimony by a government scientist, Representative Gerry Sikorski, Chairman of the Subcommittee on Civil Service, invited the Union to testify on the influence of such OMB activities on EPA employee morale. We had but five days to prepare this testimony, so were unable to do a formal solicitation of your views. Here is what we said:

"Mr. Chairman, I am William Hirzy, President of Local 2050, National Federation of Federal Employees. Our union represents the 1250 professional employees at Headquarters, U.S. Environmental Protection Agency. Thank you for the opportunity to testify on the impact on employee morale of certain activities of the Office of Management and Budget relating to EPA and its mission.

"Let me say first that the material in my testimony was gathered in a rather short time and without any formal effort. If we were to spend a person-month on this sort of project, we could present you with a much more detailed and extensive list of "incidents".

"I have arranged this testimony to cover four kinds of OMB influences on science and employee morale at EPA: 1) involvement with non-economic assessments, i.e., OMB "reviewing" scientific or engineering content of rules; 2) OMB controlling access to data required for scientific assessments; 3) OMB advising against considering science in rulemaking; and 4) sub rosa impacts not easily classified, e.g., delaying reviews, consulting interested parties off the record, and undocumentable impacts on management decision-making criteria (i.e., an Agency work group chair saying in response to some idea or proposal, "that'll never get by OMB").

"I will cite two examples of OMB's intrusion into non-economic assessments: the proposed rule on light-duty truck hydrocarbon and carbon monoxide emissions, and a proposed suspension of registration of Alaclor. In the first of these, OMB questioned the conclusions in the rule package concerning the severity of immune system effects and of irreversible lung damage related to ozone produced as a result of hydrocarbon emissions. The conclusions in the package were in fact judged to be correct for normal atmospheric conditions and were not, as OMB held, a "worst case" scenario designed to frighten the public. In the Alaclor case, a decision to suspend the pesticide's registration had been reached by agency scientists and management, based on the carcinogenicity of the chemical....But OMB refused to clear the action saying that there was not enough evidence.....As a result of OMB's action, not only was morale affected, but the Office of Drinking Water had to propose.....removal of Alaclor from groundwater-supplied drinking water systems. This transferred a substantial economic burden from the manufacturer to the public, estimated at millions of dollars per year.

"When dedicated civil servants, sworn to protect the public interest, see this kind of thing it sometimes drives them out of the Service--or out of their minds with rage. It colors their actions in subsequent work: "Why bust my tail doing a first-rate job when it'll just get torpedoed by OMB?"

"Another pernicious influence of OMB on the Agency, its mission and the morale of its staff is that of limiting access to information....(U)nder the (OMB) system....choices have to be made among which programs will get how much information--the wrong questions get asked. Instead of, "What do we need to know about this problem to deal with it most effectively?" we are faced with "What is left in the budget and how must we parcel it out among all the programs needing information?". This situation can best be characterized as part of the low-intensity, OMB frustration factor in the Civil Service that gradually eats away at employee morale in an agency like EPA. Right now, there are such limits being placed in the path of getting out a good rule on regulation of the biotechnology industry...

"The third type of adverse impact is felt when OMB advises the Agency not to consider science at all in rulemaking...(O)MB wrote in a letter to EPA on April 26, 1985, that setting a secondary, unenforceable standard for fluoride was preferred: "...In our view it would avoid the difficulty of searching for an adverse health effect..." Science, according to OMB...is only useful when it is easy. This signals the staff that "cookbook" science is not only acceptable, but preferred. You can imagine what effect that signal has on morale, on the quality of work delivered to the public, and on encouraging first-rate scientists to jump ship.

"The most difficult to document, but also the most insidious and most damaging way OMB influences the Agency and its employees is the "black hole" technique...The trihalomethanes drinking water rule languished in OMB for no apparent reason. Finally, you in Congress took steps to restrict OMB's funding, and the rule re-emerged from the black hole. Your efforts to make our work effective were appreciated. In a similar case, a drinking water rule on radio-nuclides disappeared for 6 months at OMB...(O)MB wanted to have the rule's risk level presentations changed in an unscientific way....instead of the range of risks from certain levels of radio-nuclides being presented, OMB wanted a "most likely" risk number. Staff and management resisted...but, again, a price is paid in terms of the low-level frustration factor mentioned earlier--paid by both staff and management.

"I end these examples with a summary our union's first run-in with OMB in 1985. On February 1, Richard Gross, the Branch Chief responsible for the TSCA asbestos ban/phasedown rules came storming into my office demanding to know, "What the hell is the union going to do about OMB interfering with these rules?" Since I was at the same press conference as he was, at which Deputy Administrator Barnes announced that the rules were being stopped...I was puzzled at his comments--no mention had been made by Mr. Barnes of OMB involvement. In fact I recalled a reporter asking if OMB influence was at work...and Mr. Barnes denied it. Mr. Gross then told me.... he was aware that OMB was holding up the rules until EPA

surrendered its right to regulate. To make a long story short, we asked Bob Eckhardt, Congressional 'father' of TSCA, to look into this matter. In short order Mr. Dingell informed EPA of Congress's displeasure and an investigation occurred. Among other things, it was learned that OMB held secret, closed meetings with interested parties, after which it 'put the screws on' EPA...A memorandum of understanding between EPA and OMB was eventually executed in which OMB agreed that no secret meetings would be held under such circumstances in future. Local 2050 takes great pride in this little recognized accomplishment. I would like to conclude with ...the letter we (i.e., 128 OTS staffers) sent to Lee Thomas when we first learned of...this incident; it speaks in terms clear and unequivocal about the pernicious impact of this sort of OMB machination on our morale and our agency's mission.....(The letter was read; its concluding paragraph follows:..If all future decisions on risk control are to be made by OMB in private consultations with special interests who are not identified in the public record, what is the meaning of our work?..Are we to be simply a preliminary screening group, whose task is to present options to OMB and its unknown clients, and then to await their decisions and execute them? ¶ We did not come to work for EPA to do that, and neither, we think, did you. A You Faithful If ..(If would like a copy of that letter call the Union at 382-2383.) ank you."



ACTION ON THE CARPET PROBLEM

More employees are getting sick from poor indoor air quality, some suffering in silent isolation out of fear of management retaliation. Management says that by spending a few dollars on "improving ventilation" (i.e., blowing contaminated air around at a higher rate) it has the problem "under control." Charlie Grizzle, still hasn't responded to the Union's February presentation of risk findings showing why offending carpet should be removed. The Consumer Product Safety Commission (CPSC) tells the public, "We have maybe 35 complaints in our files," while at the same time, testimony on S. 657, the Indoor Air Act, tells of hundreds of citizens pushed into chemical hypersensitivity by exposure to toxic carpet fumes. A Nebraska state agency pulls carpet containing 4-phenylcyclohexene (4-PC) after employees are made ill by it. At the same time, EPA continues to deny the connection between Waterside Mall carpet and ongoing employee illness. Sick employees get wrong advice on filing Workmen's Compensation claims. The Health Unit refuses to cooperate with employees seeking medical documentation of their condition. Attempts are made to pressure the occupational physician hired to staff the Unit and consult on air quality-related illnesses to minimize the number of illness reports. Employees trying to get into (inadequate) alternative workspace are put through the wringer. The Health and Safety Office says, "We can't be expected to provide a work place safe for everyone!" Bobbie Lively-Diebold will be out of a job in July. Even managers are refused in their requests to have the offending carpet removed. The callousness of EPA management's response to this epidemic was revealed by one of the poisoned employees in the S. 657 testimony cited above. Enough is enough.

The Union has moved the grievance filed last year to get rid of the bad carpet to Step 3 of the Negotiated Grievance Procedure. This means that either the Deputy Administrator or Mr. Reilly should hear the case along with two other management officials. The Agency will decide by May 30th who will hear the grievance.

To date, the Agency's position has been--in short--that to remove the carpet will expose employees to increased dust levels and more 4-PC. We are aware of no data having been gathered in test chambers to confirm or to quantify this contention. Thus, it seems that if the carpet were to be removed, management would require employees to remain at their desks while the carpet is pulled from beneath their feet! Give us a break Charlie! The Agency has never responded to repeated Union requests to negotiate the conditions of carpet removal, except to say "no removal."

Based on the intransigence of EPA management to date on this matter we are preparing two actions to follow the expected denial of relief at Step 3: 1) take the

matter to arbitration; and 2) cause a Section 21 citizens' petition to be filed under the Toxic Substances Control Act seeking relief for EPA employees and the hundreds (at least) of citizens who are also suffering from exposures to toxic carpet.

What You Can Do

Last summer, in just a day or two, over 800 of you signed a petition asking for removal of the offending carpet and many came to demonstrations in support of your injured fellow employees. Even though you may not be able to smell the carpet any longer except in a few places, there is more to be done...your fellow employees continue to sicken and suffer.

The first step is to inform yourselves on the science behind the Union's drive to get rid of toxic carpet at Waterside and to help citizens fighting the same battle. The second step is to prepare ourselves with financial resources to fight the battle.

In order to inform you of the facts in the case AND TO SOLICIT FUNDS TO PURSUE THE ARBITRATION, which we expect to be expensive and successful, we are publishing the Union's risk characterization in condensed form in the Fishbowl. We ask that each of you who signed that petition contribute a dollar or two (or more if you can) to the Carpet Arbitration Fund (see below) and to spread the word among your co-workers.

The complete risk characterization is available for review and comment from the Union, and has been submitted for publication in the peer literature and for presentation at the October meeting of the Society For Risk Analysis. Call 382-2383 for a copy.

We understand that management has decided not to use the data gathered on injured EPA employees in conducting its TSCA investigation of 4-PC/carpet. Bill Hirzy has been told by the Risk Analysis Branch, OTS, that fear of legal action by injured employees is one reason the data are not to be used. Refusal to use such a rich source of exposure and health effect data in a regulatory investigation is ethically inexplicable.

(Condensed) Risk Characterization of 1987-88 Carpeting at Waterside Mall

Toxicity Among EPA Employees Carpeting was installed in the workspace of and in hallways near ca. 1500 employees from October 1987 through April 1988. At least 124 employees complained of a variety of air-quality-related symptoms, including headache, nausea, mental confusion, upper respiratory irritation, skin and eye irritation and difficulty in breathing. At least 20 of these were unable to work normally at their regular duty stations. At least 8 of these now display symptoms characteristic of chemical hypersensitivity (CH) (1).

CH is controversial. Some contend that CH is purely psychogenic and can be alleviated by counselling and psychotherapy. The genesis of and treatment modalities for CH are immaterial. The illness is real, whether we are able to define a specific molecular biochemical mechanism today or not. General theories of the mechanism(s) involved have been discussed in the literature (2). Genetic pre-disposition is a likely factor, and it is well known that many human disorders are mediated by specific, genetically determined enzyme deficiencies (3).

Reports from the Public The Union has received nearly 100 unsolicited phone calls and letters from the public detailing the experiences of over 200 citizens with CH acquired through or exacerbated by new carpet or styrene-butadiene (SB) latex. (Space does not permit giving details of these cases, but a particularly significant one from Ms. Lee Ann Henderstein of Interlochen, Michigan, in which a mother, three children, four pets (2 species) and several visitors to the home were affected, has been written up and is available on request from the Union. Another, written by the Beebe family is also available from the Union.) The common exposure in these cases is to new carpet

or SB latex adhesives. 4-Phenylcyclohexene (4-PC), a Diels-Alder by-product of SB latex manufacture, is a chemical common to these exposure situations. One fascinating report is from a former researcher at NIH, known to be genetically deficient in aryl hydrocarbon hydroxylase (AHH). She was severely affected by new carpet installed in her Bethesda apartment building. AHH levels are reduced significantly by epoxy cyclohexane, a structural analogue to 4-PC's likely primary metabolite (see below).

Structure-Activity Considerations The Structure-Activity Team of OTS concluded that the epoxy form of 4-PC is a likely primary metabolite. Epoxides are known inducers of hypersensitivity pneumonitis. There is a rich literature on epoxy cyclohexane, a structural analogue of epoxy 4-PC, showing the compound to be capable of attack on chromosomes and to be active in modulating enzyme activities, particularly AHH. Also noteworthy is the remarkable enhancement of the activity (in attacking DNA) of the aniline moiety when it is substituted in the 4-position by a phenyl group (to give 4-aminobiphenyl), a situation sterically analogous to substitution of epoxy cyclohexane in the 4-position to make epoxy 4-PC. The ability of epoxy 4-PC to react with chromosomal matter, perhaps even more actively than the unsubstituted analogue, could be involved in the mechanism(s) of toxicity of 4-PC in genetically susceptible individuals.

Exposure Analysis Levels of volatile organic compounds (VOC's) in carpeted and uncarpeted spaces were measured in March 1988; levels of VOC's were unremarkable. Most noteworthy is the fact that there were no significant differences in VOC levels between carpeted and uncarpeted spaces. 4-PC in certain locations was first measured in May, then again in June and November, 1988. These measurements were used, along with data on off-gassing rates measured in test chambers at Research Triangle Park, to estimate the levels of 4-PC to which employees who developed CH or expressed other acute irritancy symptoms were exposed.

Given that the time between carpet installation and occupancy by employees of workspaces was generally about two weeks in most cases, the air monitoring data and plots of them indicate that levels responsible for induction of CH and for expression of acute irritancy responses were in the range of 1 to 10 ppb. This information is contained in the appendices to this article. Figure 1 shows that levels of 4-PC in carpet do not drop significantly over at least six months, in spite of half life calculations based on chamber off-gassing studies; other data are shown in Figures 2, 3, and 4, and Tables 1 and 2.

Assessment The strong correlation in time between exposure to new carpet and appearance of symptoms points to carpet involvement in the illnesses reported. The similarity in levels of VOC's other than 4-PC in carpeted vs. un-carpeted spaces, coupled with the appearance of illness exclusively in workers exposed to 4-PC argues for 4-PC's involvement in the illnesses, though VOC enhancement of the potency of 4-PC in causing the illness should not be ruled out. Reports from the public further support a causal relationship; especially telling are those in which exposure is exclusively to SB latex adhesive and not to carpet.

Reference dose methodology was applied to these data. The Lowest Observed Adverse Effect Level (LOAEL) was taken as 5 ppb for both CH induction and acute irritancy response. An Uncertainty Factor (UF) of 10 was used to derive a No Observed Adverse Effect Level (NOAEL). Another UF of 10 was used to account for more sensitive individuals, since those affected here were "healthy workers," and a Modifying Factor (MF) of 10 was used to account for uncertainty about the actual LOAEL, about the cumulative dose of 4-PC that may be required to induce CH, and the severity of the CH effect—a MF of 3 was used for the acute irritancy response calculation because of the apparent transient nature of the phenomenon. Thus, the Reference Dose exposure levels to protect against induction of CH and acute irritancy response are 0.005 ppb and 0.01 ppb, respectively.

If you wish to contribute to the Carpet Arbitration Fund, please contact the Union at 382-2383; don't send checks or cash in the inter-office mail. We will keep records of contributions, and if any funds are unused, the Union will provide you the

Table 1
Carpet Off Gases Collected in Waterside Mall Warehouse

Compound	Concentration in ppb	
	Method 1*	Method 2**
Ethylene	22.1	11.0
1,1-Dichloroethene	4.6	1.7
m & p Xylene	4.6	0.0
o Xylene	---	1.0
Styrene	11.0	11.0
Cumene	4.1	6.9***
Dichlorobenzene	60.1	10.0***
4-Phenylcyclohexene***	70.7	presence confirmed
Propylbenzene	N/A	2.5***
Trimethylbenzene	N/A	1.6***
Ethyl toluene	N/A	5.1***
n-Decane	N/A	4.1***
Undecane	N/A	6.9***
Other VOCs	---	14.7***

* Method 1: Collection on charcoal, analysis by GC/FID
 ** Method 2: Collection on Tenax, analysis by GC/MS
 *** Co-eluting compounds
 **** 1-Phenylcyclohexane as reference standard
 N/A Not Analyzed
 Source: Memorandum: Burchette and Singhvi 6/22/88

FIGURE 1

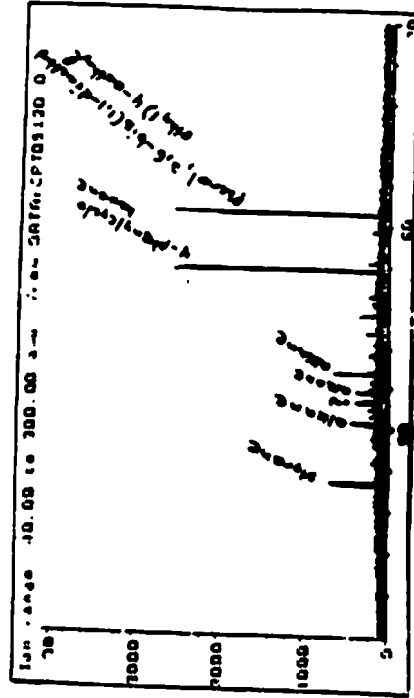
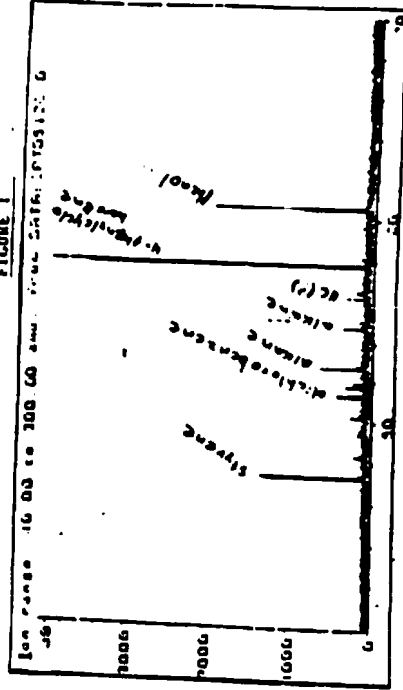
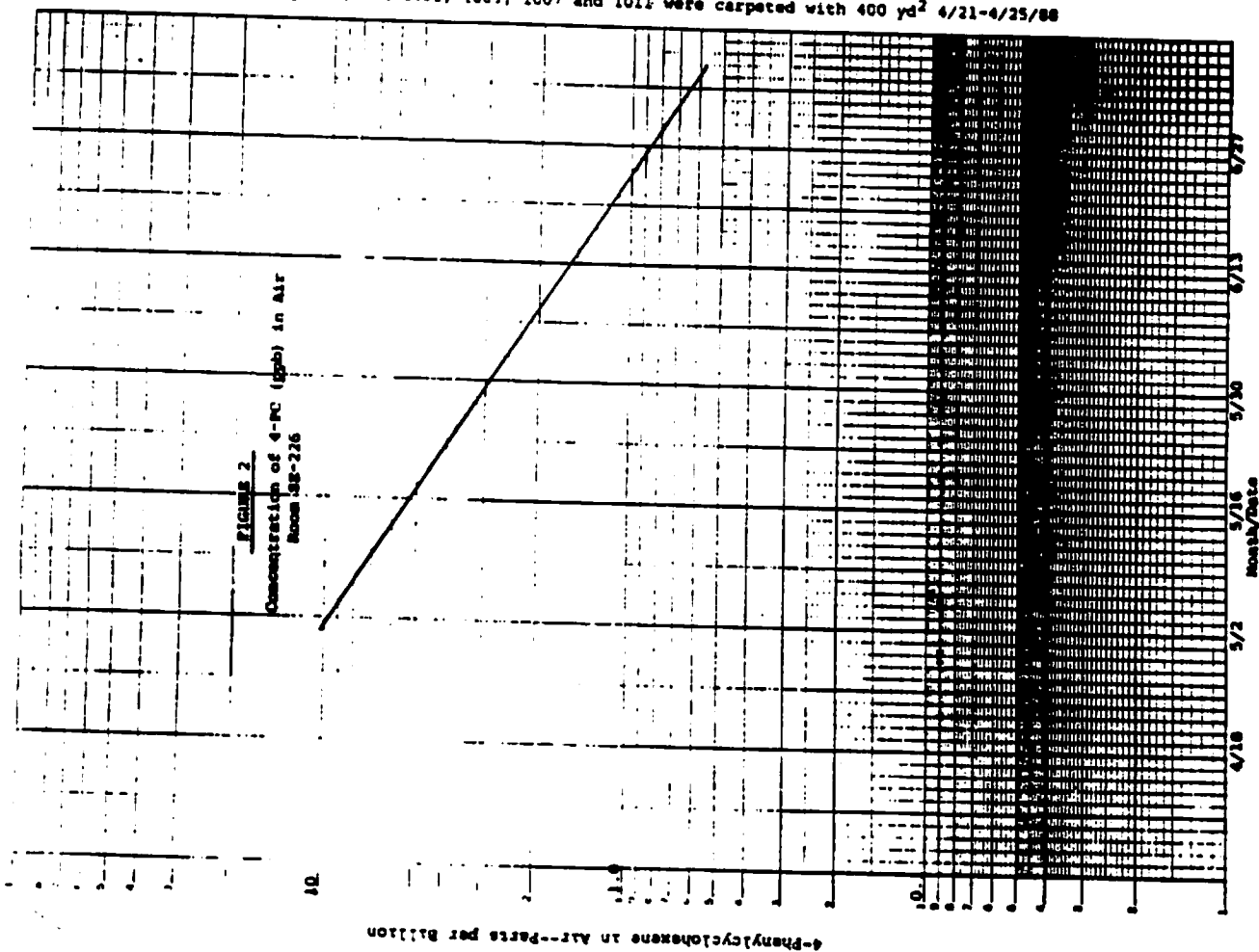


TABLE 2

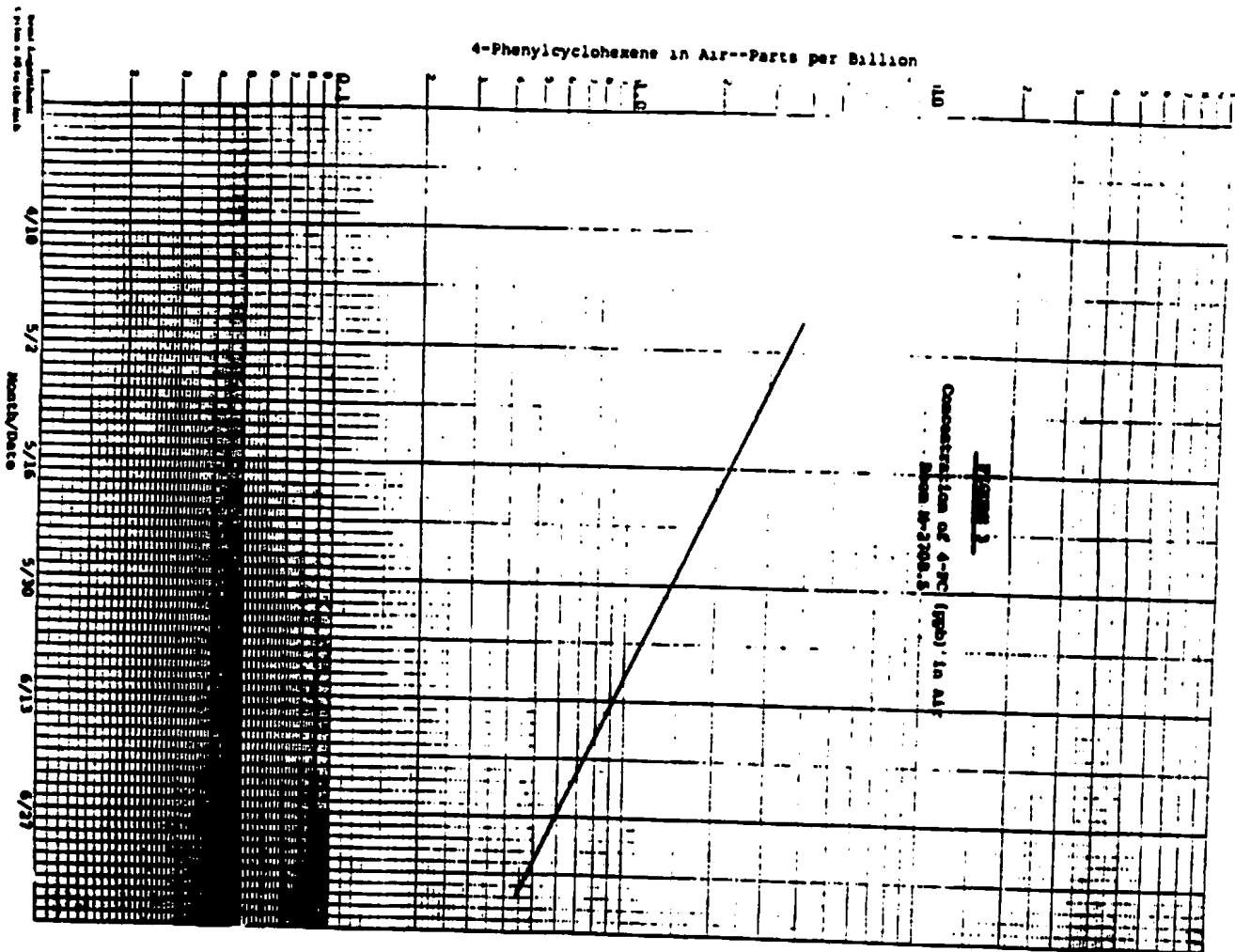
Levels of 4-PC and Formaldehyde in Waterside Mail Rooms

Room	Date	Carpeted Amount, yd ²	4-PC and Formaldehyde Levels, ppb					
			5/13/88*		5/25-5/25/88**		6/1/88**	6/29/88***
			4-PC	4-PC	CH ₂ O	CH ₂ O	4-PC	
SE-209	4/88	698		5.2/2.7	4/4.1		3.79	
SE-274	4/88			0.89/0.48	49/7.1			
M-2632	4/88	130		0.13/0.18	429/284	9.0		
M-2708.5	4/88	100		2.2/1.3	4/37		0.56	
M-2710	none			3.37/0.03	59/ 4	2.4	0.21	
M-2811	4/88	153		2.6/0.79	9/ 4			
M-2827	3/88	72		0.84/1.1	46/ 4			
M-1241	4/88	198	1.3	2.1/1.1	59/5.7		0.14	
				1.1/1.1				
M-3304	none			0.17/0.23	4			
				0.1/0.2				
ET-935	4/88	unknown	0.6	0.87/0.63	4			
				0.5/0.7				
ET-1015	****			0.25/0.03	4			

* Memorandum: Highsmith et al. Office of Research and Development, 7/15/88
 ** Memorandum: Singhvi et al. Emergency Response Team, 6/27/88
 *** Emergency Response Team, Draft Results, 8/2/88
 **** ET-1015 was never carpeted, but 1701, 1001, 1007 and 1011 were carpeted with 400 yd² 4/21-4/25/88



4-Phenylcyclohexene in Air--Parts per Billion



option of receiving a pro rata refund or designating the funds for other use.

We repeat the offer to serve as intermediary between management and injured employees in negotiating a settlement of this problem. Surely, if EPA is to lay claim to a leadership role in developing cooperative methods for resolving environmental problems, we must show by our deeds that we are worthy of such a role. And we could forget about arbitration and legal action. The ball is in management's court.

References

1. (a) Cullen, M.R. The worker with multiple sensitivities: an overview. Occupational Medicine: State of the Art Reviews, 2 655 (1987). (b) Thomson, G. M. (Chair). Report of the ad hoc committee on environmental hypersensitivity. Canadian Ministry of Health, Toronto, Ontario. August, 1985.

2. (a) MacQueen, G., Marshall, J., Perdue, M., Siegel, S., Bienenstock, J. Pavlovian conditioning of rat mucosal mast cells to secrete rat mast cell protease II. Science, 243 83 (1989).

(b) Barr, P.T. Asthma as an axon reflex. The Lancet, 242 (1986). (c) Barnes, D.M. Neous and immune system disorders linked in a variety of diseases. Science, 232 160 (1986).

3. Stokinger, H.E. Historic aspects of occupational health standards and the sensitive worker. Annals of the American Conference of Governmental and Industrial Hygienists Vol. 3: Protection of the sensitive individual. Ed. William Kelly, ACGIH, Cincinnati OH (1982).

UNION VICE-PRESIDENTS HONORED



Local 2050 Vice-Presidents Charlie Garlow and Daljit Sawhney have been recognized for their professional and community service achievements. Daljit was elected by his colleagues of the National Association of Federal



Veterinarians as Alternate Counselor, and Charlie received the Agency's Award of the Committee on Integrity and Management Improvement.

Daljit was elected by his colleagues in recognition of his longstanding activities on that professional organization and his high quality contributions to the Association's programs. Charlie led the fight for the Curbside Recycling Bill in the District and for its predecessor, the "Bottle Bill". Charlie has also led the Union's Social Solidarity Committee and chaired the Partners-In-Education speakers bureau committee.
Well Done, Guys!

OSC CONTINUES INVESTIGATION OF EPA'S
INSPECTOR GENERAL

Jonathan W. Chudson and J. Richard Wagner, two employees of the EPA Office of the Inspector General, have alleged in complaints to the MSPB Office of Special Counsel (OSC) that OIG management officials have taken reprisals against them for whistleblowing, grievances, and other protected activities. On April 4, 1989, Inspector General John C. Martin agreed to await the results of the OSC investigation before deciding Chudson's grievance concerning his 1988 performance.



On April 13th, Wagner sent a memorandum to Acting Deputy Administrator John A. Moore pointing out that, in his case, Martin had reassigned him from San Francisco to Washington, D.C., while the OSC investigation was pending. He added that Martin had moved him away from his wife and home, and had forced him to become Special Assistant to Assistant Inspector General for Investigations John E. Barden, an official whom Wagner and others had accused of a variety of crimes and improprieties. On April 19th, the Government Accountability Project (GAP), an independent organization

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which helps whistleblowers, sent Moore a letter concerning Wagner and Chudson. That letter asked that an inquiry be conducted by Moore's own staff, to include a review of the facts and a briefing by the OSC investigator.

Wagner's memorandum to Moore pointed out that he could not realistically be expected to sell his home in California (where his wife is living and working) while the results of the OSC investigation were pending. He requested that he be returned to his former position in San Francisco until the OSC investigation is concluded and the results presented to the proper authorities.

On May 9th, Wagner received a memorandum from Moore, which stated that "...it is prudent first to allow OSC to conclude its investigation." Moore added:

"Moreover, the Inspector General has the authority to assign the workforce of the Office of the Inspector General as he sees fit, consistent with the law. While the Inspector General is under my supervision in accordance with the Inspector General Act, as amended, he has independent authority to select, appoint, and employ officers and employees. Thus, I will not interfere with the Inspector General's independent authority in this matter."

As of the same date (May 9th), GAP has received no response to its letter of April 19th.

NFFE NATIONAL QUESTIONS IG's QUESTIONNAIRE TO LAWYERS

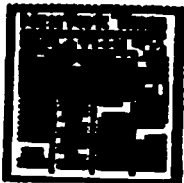
As reported in the March Fishbowl, the Inspector General (IG) has sent investigative questionnaires to some Headquarters' attorneys. In addition to initiating bargaining over the process, Local 2050 contacted the National Office of the Union for advice and help. The General Counsel of the National Union has had staff attorneys look into the ramifications of the IG's actions. One piece of information uncovered is that the National Treasury Employees Union has filed suit in the District Court in a related case, and NFFE is following this activity closely and may file suit on behalf of EPA employees.

Particularly troubling are the potential of release of information in the questionnaires to a broad spectrum of Federal agencies, the arbitrary selection of people to receive the questionnaires, and the constitutionality of some questions. There is also suspicion that this move by the IG is the first step in re-structuring the Agency's drug testing policy so that many, many more employees will be "eligible" for random testing by dint of their re-classification as "sensitive" employees.

If you have received communication from the IG indicating that you are to submit answers to these questionnaires, or if you have other relevant information or views to express, contact NFFE National staff attorney, Ann Morgan at 862-4415.

REMEMBER THE HOMELESS AND NEEDY --





CLIPPINGS TO CONSIDER - - -

Gadflies' rights

Rufus Morison has been the subject of at least two continuing investigations by his employer, the U.S. Environmental Protection Agency, and we are wondering why.

The Alexandria resident, who has worked for the agency since 1976, has, by his own admission, a reputation as a gadfly. He has riled his superiors with union activities and by his vocal contention that dimilin is not environmentally safe as a pesticide to control gypsy moths.

The investigations began last year and continue. According to Morison, one involved a threat he supposedly communicated in November, in the form of a story told during heated labor negotiations.

The story, which Morison said was a recounting of negotiations that occurred some decades before over coal miners' demands, ended with the murder of a negotiator. Morison said he implied no threat in the story.

More recently, Morison has been under investigation in connection with his public opposition to the use of dimilin in Alexandria. Morison told the city council that the pesticide threatens chemically sensitive people and that its power to destroy ecological communities does not justify its use in the eradication of the pesky leaf-eaters.

In October, this newspaper published an opinion piece on the subject by Morison.

Each time Morison made his views known, he followed the EPA's rules for airing privately held opinions, stating unequivocally that his views were his own, not the EPA's.

While the agency would not comment for us on either investigation, we do know this: Morison said he has been assured by an investigator that he violated no agency rules in his testimony before the city council. He said the investigator had reviewed videotapes of the meetings and determined that Morison had correctly characterized his views as his own.

The same investigator called the editors of this newspaper at least four times asking whether Morison had represented the views in his opinion piece as the EPA's. She was informed repeatedly that Morison had insisted the views expressed in the piece were his own, not the EPA's. It might have helped the situation if we had included an explicit disclaimer; but to the extent that such an omission is culpable, the fault is ours, not Morison's.

Months later, both of these investigations apparently are still pending.

We would be the first to say there may be aspects to these investigations with which we are unfamiliar. Our access to information is based solely on what Morison has told us and the content of the investigator's phone calls. But we are inclined to conclude that much is being made of little, and that the investigations are being dragged out unnecessarily.

We wonder about the motive. It is at least possible that the back-to-back investigations are retaliatory. Or worse that they are meant to intimidate the ecologist into keeping his views to himself.

Morison can be prickly, and his views on dimilin may embarrass the EPA. But gadflies, like the rest of us, have rights, and they have a role to play. Their buzz may be

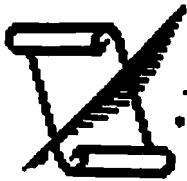


bothersome, but it should not be squelched like the spring eating frenzy of so many gypsy moths.

-Text and cartoon used by permission of the Alexandria Gazette Packet and appeared on page 12 of the issue of Wednesday, April 19, 1989.

INSPECTOR GENERAL HARASSES UNION VICE-PRESIDENT MORISON

As the adjoining editorial from the Alexandria Gazette Packet tells, Vice-President Rufus Morison is being harassed by the Inspector General's (IG's) office for exercising his constitutional right to free speech. This, coupled with recent information the Union has received about other alleged abuses of employees by the IG's office (see recent Fishbowl) makes us wonder whom the IG is working for. It surely does not seem to be for the public interest!



GUEST EDITORIAL *

* Views expressed in Guest Editorials are those of the authors; they do not necessarily represent those of NFFE Local 2050 or its members.

SOME ADVICE TO THE NEW ADMINISTRATOR

by Salvatore F. Biscardi

During the recent past, it has become painfully obvious that pollutants do not fall under the sole jurisdiction of just one EPA program office but are, in reality, the problem of many, if not all, program offices. Rarely does any pollutant exist in just one medium, such as air, water, or soil. In reality, pollutants exist in a multimedia environment and must be considered eventually a total environmental problem which knows no artificial boundaries of any specific program office's jurisdiction. Today's pesticide is tomorrow's hazardous waste that may be spilled. And the day after tomorrow, the spilled hazardous substance may enter groundwater to then pollute the drinking water. Should the hazardous substance evaporate, then this same pollutant enters the air we breathe. Undoubtedly, past Administrators have seen various regulations concerning the same chemical come across their desks at different times from different EPA program offices. No place but at the "top" of EPA can it be so clear that bridges must be built between EPA's AA-ships to help forge one consistent regulatory policy, one consistent toxicity profile, one consistent enforcement policy, and essentially (insofar as the varying statutes administered by EPA will allow) consistent regulations for any one pollutant. Such a situation would produce coherence and would be cost-effective. At the same time, such a posture would produce the least amount of trauma with respect to the regulated community.

If the Administrator's view from the "top" is or becomes a "holistic" or unified approach to regulation, the question remains how best to implement this policy. I offer a few observations as a professional involved in the Agency's "bread and butter" work. Pollutants have already been grouped on the basis of chemical structure into "classes" of compounds. Attempts are continuously made to correlate structure to toxicity. In the pharmaceutical industry, attempts are made to correlate structure to function, since toxicity (which is a process, a continuum or progression of events) does not and cannot correlate to any specific event in the continuum unless the toxicity results in a clearly defined endpoint, such as carcinogenicity, for example.

One correlation that would be possible is one relating the structure of the pollutant and the functional deficit it produces. Now, finally a clearer picture emerges. While in the process of evaluating the toxicities of substances over the years, one notices that certain compounds are capable of being grouped according to their ability to produce a specific functional deficit. For example, nitrates and nitrites produce methemoglobinemia. Dinitrotoluenes, as well as aniline compounds, also produce this same hematological deficit. TSCA section 8(e) reports have been received by EPA with respect to many substances demonstrating this same adverse effect. In addition, many new chemicals for which Premanufacture Notices have been submitted under section 5 of TSCA appear to elicit this same functional deficit, as do several pesticides which are regulated under FIFRA. The TSCA Inventory of Chemical Substances (a list of about 70,000 substances) is replete with chemicals that could be segregated into groupings according to a given functional deficit which they elicit.

It is self-evident that it would be realistically impossible to test each and every existing substance listed on the TSCA Inventory, each and every new chemical substance, and all existing or new pesticides for potential toxicity. Available funds, testing facilities, and the time required for testing all indicate this approach to be futile. What would suffice would be to test a few compounds with the predicted capacity to produce the greatest amount of a given function deficit (such as methemoglobinemia) at the smallest dose level, using the most sensitive animal species (if known), seeking to establish a "least-effect level" and a clear "no-effect level." Once these data are available, then a "safe" dose might be estimated using appropriate

"safety factors." Safety factors should take into consideration that segment of the population that would be most sensitive from perceived exposure levels, if these can be determined. These data might be universally applied to all those compounds producing the same functional deficit, with the understanding that this deficit is known to be the most sensitive toxicological parameter for these compounds. From a toxicological point of view, it is evident that other toxicities derived secondarily from the oxygen-carrying deficit due to methemoglobinemia would, in all likelihood, have higher "least-effect levels" and higher "no-effect levels." Such other toxicities might include reproductive toxicity attributable to a decreased oxygen-carrying capacity of maternal blood, behavioral toxicity, due to oxygen deficit to the nervous system of the fetus occurring during the period of major organogenesis, etc.

There are many groups of chemical substances that show an identical kind of toxicity due to an identical mechanism of action. These compounds, such as the anilines and the nitrates and nitrites and the dinitrotoluenes, can be grouped together and studied for their "least-effect levels" and "no-effect levels" for a given functional deficit. Once this has been done, then a whole host of chemicals may be dealt with, using data obtained by the appropriate route of exposure, by all of EPA's program offices in a consistent manner.

It is clear that the bridges which need to be built between EPA's AA-ships can only be constructed with the "cement and stone" representing the work of those professionals who participate in the "bread and butter" activities of the Agency. These professionals have the experience and training to enable them to bracket a single frame around a holistic environmental picture.

A closer cooperation is needed between those at the "top" of EPA and those who routinely conduct the Agency's scientific work. A good cement is badly needed to unite these two groups, without air-spaces in the middle.

Caesar was successful because he reportedly personally knew each and every one of his soldiers. Although times have obviously changed, can't we make at least some movement in this direction at EPA?

Salvatore Biscardi is a Pharmacologist working within the Oncology Branch, Health and Environmental Review Division, Office of Toxic Substances.

EPA EMPLOYEES TO EVALUATE THEIR SUPERVISOR OFFICE OF DRINKING WATER TAKES THE INITIATIVE

"The road to good management is always under construction." Office of Drinking Water (ODW) Director Mike Cook observed at an ODW all-hands meeting on Tuesday, April 25, 1989, as he announced a pioneering program in evaluation of supervisory performance by ODW employees. Confidentiality and anonymity were assured through hiring the University Research Corporation (URC) to collect, analyze, and summarize employees' responses to a 46-item questionnaire. NFFE Local 2050 President-elect Bob Carton and Vice-president Jim Murphy attended the ODW all-hands meeting.

Last September, Mr. Cook told his managers: "I would like to proceed to set up a system for enhancing upward communication by staff evaluation of supervisors." Moving quickly, the Upward Communication Implementation Committee (UCIC) convened to draft a questionnaire and a plan for implementing it. A long list of questions was prepared in October, and pared down to a more manageable 40-45 questions in November. Management reviewed the questionnaire, which fortuitously resembled the questionnaire developed by the Office of Human Resources Management. AFGE and NFFE unions also reviewed the questionnaire; NFFE Local 2050 President Bill Hirzy wrote: "The Union commends Mike Cook and the ODW team for its forward-looking proposal to evaluate supervisors and to seek Union input in a very timely way."

On April 27th, the revised questionnaire was distributed to ODW staff, who had until May 4th (May 11th at the very latest) to send their responses to URC. The responses will be summarized by section, branch, division, and office, and reported (as

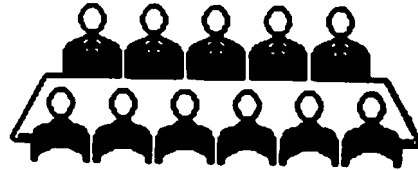
summaries) to the ODW supervisors by June 2nd. The goal is better communication, with nobody feeling threatened by the process. The process is intended to guide constructive change, and is not intended to replace the traditional one-on-one discussions with supervisors.

The questionnaire had 3 questions on background, 10 on leadership and supervision, 11 on evaluation and recognition of work, 9 on communication skills, 4 on team-building and training, 6 on supervisory skill, and 3 on the effectiveness of higher-level organization. Staff were asked to complete two questionnaires, one for their immediate supervisor and one for the next-higher supervisor.

The UCIC was chaired by Edward Ohanian, Chief of ODW's Health Effects Branch, and included Betsy Devlin, David Hubner, Brian Rourke, Mario Salazar, David Schnare, James Westrick, and Jannell Young.

JOIN NFFE TODAY---

TOGETHER--We WILL
Make a *DIFFERENCE* !

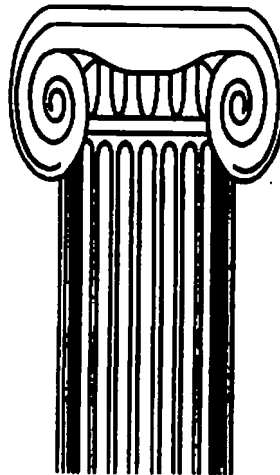


CURRENT NFFE LOCAL 2050 OFFICERS

PRESIDENT:
PRESIDENT-ELECT:
VICE-PRESIDENTS

NFFE-PHONE
382-2383

SECRETARY:
TREASURER:
CHIEF STEWARD:



BILL HRZY	382-2327
BOB CARTON	382-2325
RUFUS MORISON	382-4273
MARK ANTELL	382-2878
JIM MURPHY	382-7591
CHARLIE CARLOW	475-7088
LOIS DICKER	382-3387
DAL JIT SAMHNEY	382-4289
HALE VANDERMER	557-7336

EPA PROFESSIONALS AND FRIENDS---
NFFE LOCAL 2050

Invites You - - -

Date: Wednesday, June 7th, 1989

Time: 12 Noon to 1.P.M.

Place: Room 103 N.E. Mall

For

- * Installation of New Officers from May 25th Election
- * Reflections on Triumphs and Trials of 1988-1989
- * Planning Union Projects for 1989-1990



Free Light Refreshments Served---
(Fruits, Yoghurt, Desserts, Beverages)



MEMBERS: Contribute a home-made dessert, if you can!
(Contact Lois Dicker at 382-3387 to sign up)

Bring a potential new member with you!

**TOGETHER--We WILL
Make a *DIFFERENCE* !**

REQUEST FOR PAYROLL DEDUCTIONS FOR LABOR ORGANIZATION DUES

Privacy Act Statement

Section 5525 of Title 5 United States Code (Allotments and Assignments of Pay) permits Federal agencies to collect this information. This completed form is used to request that labor organization dues be deducted from your pay and to notify your labor organization of the deduction. Completing this form is voluntary, but it may not be processed if all requested information is not provided.

This record may be disclosed outside your agency to: 1) the Department of Treasury to make proper financial adjustments, 2) a Congressional office if you make an inquiry to that office related to this record, 3) a court or an appropriate Government agency if the Government is party to a legal suit, 4) an appropriate law enforcement agency if we become aware of a legal violation, 5) an organization which is a designated collection agent of a particular labor organization, and 6) other Federal agencies for management, statistical and other official functions (without your personal identification).

Executive Order 9397 allows Federal agencies to use the social security number (SSN) as an individual identifier to avoid confusion caused by employees with the same or similar names. Supplying your SSN is voluntary, but failure to provide it, when it is used as the employee identification number, may mean that payroll deductions cannot be processed.

Your agency shall provide an additional statement if it uses the information furnished on this form for purposes other than those mentioned above.

1. Name of Employee (Print—Last, First, Middle) X	2. Employee I.D. Number (SSN or Other) X	3. Timekeeper Number X
4. Home Address (Street Number, City, State and ZIP Code) X	5. Name of Agency (Include Bureau, Division, Branch or Other Designation) X	

Section A—For Use By Labor Organization

Name of Labor Organization (Indicate Local, Branch, Lodge or Other Appropriate Identification)

NATIONAL FEDERATION OF FEDERAL EMPLOYEES LOCAL 2050

I hereby certify that the regular dues of this organization for the above named member are currently established at \$ 5.25 per (biweekly) pay period) (calendar month). (Strike out whichever period is not appropriate, based on arrangement with the employee's agency.)

Signature and Title of Authorized Official	Date (Month, Day, Year)
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Section B—Authorization By Employee

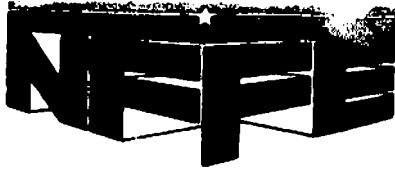
I hereby authorize the above named agency to deduct from my pay each pay period, or the first full pay period of each month, the amount certified above as the regular dues of the (Name of Labor Organization) _____ and to remit such amount to that labor organization in accordance with its arrangements with my employing agency. I further authorize any change in the amount to be deducted which is certified by the above named labor organization as a uniform change in its dues structure.

I understand that this authorization, if for a biweekly deduction, will become effective the pay period following its receipt in the payroll office of my employing agency; and that, if for a monthly deduction, it will become effective the first full pay period of the calendar month following its receipt in the payroll office of my employing agency. I further understand that Standard Form 1188, Cancellation of Payroll Deductions for Labor Organization Dues, is available from my employing agency, and that I may cancel this authorization by filing Standard Form 1188 or other written cancellation request with the payroll office of my employing agency. Such cancellation will not be effective, however, until the first full pay period which begins on or after the next established cancellation date of the calendar year after the cancellation is received in the payroll office.

Signature of Employee X	Date (Month, Day, Year) X
----------------------------	------------------------------

FOR COMPLETION BY AGENCY ONLY—The above named employee and labor organization meet the requirements for dues withholding (Mark the appropriate box. If "Yes", send this form to payroll. If "No", return this form to the labor organization.)

YES NO



MAY 25 1989

Local 2050

MEMORANDUM -

Subject: Renovations during Working Hours

From: J. William Dwyer, President
National Federation of Federal Employees Local 2050

To: John C. Chamberlain, Director
Office of Administration

The Union shares your desire to make this facility a more attractive and comfortable workplace and to do it while ensuring employees safety and health. The policy change you announced in a memo-drop on May 23 to permit renovation work during normal business hours concerns us, however. I urge you to reconsider this policy change in view of the problems we continue to have at Waterside Mall with indoor air quality. The additional cost to EPA of employee illnesses that may result from implementing the policy should be factored into your decision, along with the humane concept of not putting our people at unnecessary risk.

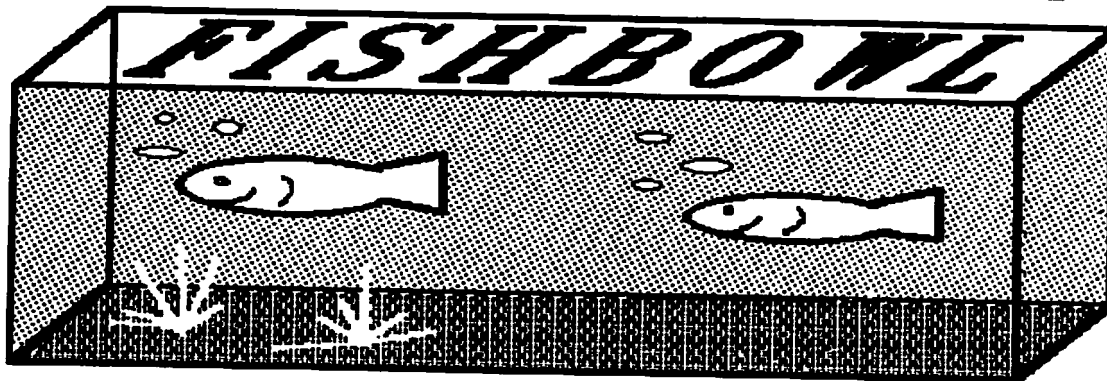
If you determine that costs to EPA of employee illnesses and putting EPA employees at risk do not off-set Mr. Bresler's additional costs, and you decide to implement the policy anyway, we want to bargain with you regarding the impact and implementation of this change, since it affects the terms and conditions of employment of our bargaining unit members. In the event that you decide to implement the policy, we may take action in addition to impact and implementation bargaining.

No renovations should take place under the new policy until an agreement is reached between us.

Please let me know by close-of-business June 2 what your decision on this matter is.

cc: Loree Murray
Charles Grizzle
The Bargaining Unit

INSIDE THE



NATIONAL FEDERATION OF FEDERAL EMPLOYEES

P. O. BOX 76082
WASHINGTON, DC 20013
OFFICE: ROOM 302 NE MALL

NFFE

LOCAL 2050

(202) 382-2383

EPA HEADQUARTERS' PROFESSIONALS

"We must conduct our affairs at EPA as if we worked inside a fishbowl—"
William Ruckelshaus, Former Administrator, U. S. EPA

JUNE--1989

VOLUME 5--No. 6

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NFFE
LOCAL 2050

JOIN TODAY —

FISHBOWL STAFF

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NEFE GIVES TESTIMONY ON CABINET STATUS FOR EPA

On June 21st, Local President Bob Carton "pinch-hit" for a virus-stricken Bill Hirzy in delivering testimony on Cabinet status for EPA. The testimony (modified transcript follows) on H.R. 534 was given before Rep. John Conyers' Legislation and National Security Subcommittee of the House Government Operations Committee.

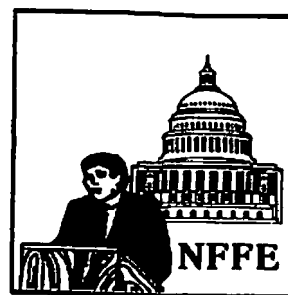
"Mr. Chairman:

"I am Robert J. Carton, President of Local 2050 of the National Federation of Federal Employees. Our Union represents the 1200 scientists, engineers, lawyers and other professional employees at Headquarters of the Environmental Protection Agency. On their behalf, I thank you for this opportunity to testify on the intent of House Resolution 534 to elevate EPA to Cabinet rank.

"Upon receiving your invitation to testify, we solicited the views of the 1200 people we represent, and the testimony I deliver today is—in reality—theirs. The message they have instructed me to bring to you is a mixed one.

"Let me first say that the underlying goal of H.R. 534—To position environmental affairs more prominently on the Nation's agenda—is not only laudable and important for America's future, it is critical for the salvation of the planet. In recent years, our Federal government's efforts at cleaning and protecting the environment have fallen evermore short of public expectations—and much more ominously—of the requirements that natural laws place on us for survival. I will not repeat here the dire warnings you've already heard about the catastrophic consequences of global warming awaiting us as surely as tomorrow's sunrise; nor the warnings over the growing threat of toxic chemicals to our immune systems, only now beginning to be comprehended; nor the warnings about the implications of poisoning our oceans with toxic wastes; nor the warnings about losses of crop lands and groundwater to development activities and toxic pollution. You know full well that these are threats to our National interest as potent—if not as well or broadly understood—as most military threats America has faced.

"If America does not face up to its obligatory leadership role in confronting these challenges, other nations are less likely to take the kind of action Mother Nature is demanding of us if we are to survive as a species.



"Congress's efforts--through H.R. 534 and other means--at bringing these matters more prominently to the President's and the peoples' attention brings credit to the institution. It is forward-looking and deserves bipartisan support and public commendation.

"In addition to the over-ridingly important function of placing impending environmental calamities squarely in the public's view and enhancing action on them, there are other significant, if less dramatic, benefits to be derived from elevation of EPA to Cabinet rank. Not the least of these is that the Environmental Secretary will have more direct access to the President and more direct interaction with other cabinet-rank officials, as issues with environmental implications are discussed and resolved. And during such discussions, the Environmental Secretary will enjoy equal status with his or her counterparts. This same consideration of course applies in the international arena as well. Cabinet status for EPA should also make it more possible for the President to stay on top of emerging environmental issues and intervene, if necessary, much more quickly than at present. EPA's minimal involvement--especially at the working scientist level--with the Prince William sound oil disaster is a case in point.

"Another potential advantage of Cabinet status for EPA could be amelioration of the present state of affairs in which EPA is looked upon as a "weak sister" by other departments, a "weak sister" whose complaints about, e.g., Defense and Energy Departments' cavalier attitudes about environmental pollution, can be ignored or put off. Looking at it in a more positive light, more direct interaction--between equals--can take place between the Environment Department and other departments. As we become ever more conscious of the environmental implications of government actions, this sort of consultation among equals is likely to become more common and more necessary, especially during the early planning phases of actions.

"But Cabinet status for EPA will not, by itself, be sufficient to produce either the public attitudes or the governmental actions needed to save the planet.

"Nor will it--in H.R. 534'S present form--bring the reforms in EPA operational and management philosophy that are desperately needed to make the Federal environmental program work.

"Comments from our bargaining unit include these observations on negative aspects of Cabinet status: there will be no less need for Congressional oversight; there is not likely to be any savings in expenses; there may be more constraints placed on us as "members of the club" than we now have as an independent agency; we may be saddled with more layers of management "fat"; there is no intrinsic increase in accountability in Cabinet status; Cabinet rank, by merely conferring the title "Secretary" on the chief officer, doesn't necessarily provide high "status" (especially in the eyes of the public) if that officer lacks other attributes--the relative reputations of James Watt and William Reilly and how they have affect(ed) their agencies is a case in point; we may get tied up in reorganization if we get Cabinet rank, wasting time and money; Assistant Administrators already have pretty high "status"; and Cabinet rank doesn't directly speak to the need for more resources to do environmental protection work.

"Almost every EPA employee who responded to our call for comments on this question noted that the "fiefdom" problems at EPA--i.e., the virtual independence of each Assistant Administrator from all others and from the Agency's head--will not be solved by elevation to Cabinet rank. "A serf remains a serf, whether the liege lord is an earl or a duke", in the words of one EPA professional. What we urgently need at EPA to upgrade our ability to accomplish the mission you have set before us is to eliminate earls, dukes and serfs altogether, and to institute a system of collegiality, respect for professionalism, and participatory management. Under such a changed

**WRITE YOUR REPRESENTATIVES URGING
PASSAGE OF H.R. 534 !**



FISHBOWL--PAGE 4

system, we professionals can play our constitutional role as advisors to elective- and appointive office holders in an atmosphere conducive to the best possible performance of our duties.

"Working at EPA is not regarded in the professions as a career-enhancing activity. That is a sad, but accurate statement of a reality that must change. Not only must we as a Nation engage the environmental challenges I mentioned earlier, we must engage them intelligently, systematically, vigorously-- with the best talent most efficiently organized that our society can muster. In order to bring the best talent into EPA and in order to engage them in the struggles lying before us, we must first change the perception of EPA as a terrible place to work into a perception of EPA as the only place to work for professionals dedicated to serving the public by saving the planet.

"You can help make this change in perceptions happen by mandating in the enabling legislation for Cabinet status the following:

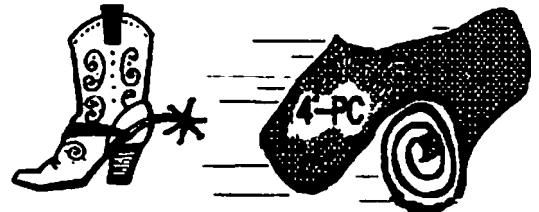
- A program shall be established to develop, hire and retain national and international experts within the Department in all fields of science, engineering, law, and financial management that apply to the Department's mission. These experts, rather than non-civil service personnel, will be relied upon for Department decisions on scientific, engineering or legal matters to the extent possible and consistent with law. The Secretary shall submit a report to the Congress on the progress of this program each year on the anniversary of the date of enactment of this bill.
- The Assistant Secretary for Administration and Resources Management, in consultation with any exclusive representative(s), shall establish and administer a program of participatory management within the Department. The Secretary shall submit a report to the Congress on the progress of this program each year on the anniversary of the date of enactment of this bill.

"These changes in H.R. 534 are simple, but far-reaching. They are consistent with recommended changes in government employment practices that are beginning to emerge from, e.g., the Volcker Commission.

"If elevation of EPA to Cabinet status is not to become a purely window-dressing exercise that will lull the public and the rest of the world into thinking that America is finally getting serious about environmental action, then the legislated changes in EPA structure and management I've just outlined must be added to the enabling legislation. With those changes, I can guarantee you, from the environmental professionals' point of view, that the Department of Environmental Protection will be a far different place than the Environmental Protection Agency.

"It will be a place where professionalism and professional ethics are routinely honored and expected. It will be a place where the best science, engineering and law drive our environmental programs. It will be a place where there is "civil service, without servitude". And it will be a place that you in Congress, the President, indeed all Americans, can point to with pride and say, "here is where America is working hard, and working smart, every day to keep this planet the beautiful, livable spaceship that God originally created". More than anything, Mr. Chairman, that is what we who do your work, the public's work, want. Thank you."

**TIME TO KICK OUT EPA'S
TOXIC CARPET --- NOW!!!**



FISHBOWL--PAGE 5

CONGRESS CALLS EPA ON THE CARPET

EPA Administrator Reilly received two highly significant letters from Capitol Hill this month on the carpet problem. The letters came from (jointly) the offices of Senators Paul Sarbanes and Barbara Mikulski, and (jointly) from the offices of Representatives Gerry Sikorski, Constance Morella, Steny Hoyer, Frank Wolf, Beverly Byron, Stan Parris, (Delegate) Walter Fauntroy, Thomas Ridge, Benjamin Gilman, Frank Horton, Frank McCloskey, Rod Chandler, Gary Akerman and Mervyn Dymally.

The letters echo the messages that the Union and the Committee of Poisoned Employees have been sending Mr. Grizzle and his underlings throughout this exercise in managerial ineptitude, viz. "take out the carpet that is making people sick". Since no progress has been made in dealing with Mr. Grizzle, the decision to raise the matter through the Congress directly with Mr. Reilly was taken. Cooperative action by COPE and the Union is responsible for the letters.

Here are excerpts from the Senators' letter... "The Office of Administration has refused to remove the carpets citing a lack of scientific evidence that the carpets are the source.. We have been told that the Office of Administration has been considering a number of options, but frankly we feel that they are dragging their feet. We regret having to raise this issue to your level.. It is ironic that (EPA) is allowing its employees to work in a contaminated environment.. We ask that (Charlie Grizzle) work with our staffs to reach an acceptable and timely solution.."

The Representatives' letter, in part, reads... "We are writing to express our concern regarding the continuing health problems at (EPA).. This situation was brought out in testimony (to) the Subcommittee on Civil Service on May 17th.. From discussions with employees.. we have learned of continuing health problems.. some have even had to leave the building permanently.. several international visitors have also been affected.. we believe that the continuing exposure of EPA employees is imprudent. Existing data indicate that the removal of the carpet would be an appropriate action, and thus we recommend that the Agency immediately reconsider its decision to keep the carpet in place."

As stated in the last Fishbowl, EPA owes the Union a reply to the final step grievance on this matter. Mr. Reilly promised to have a reply to us by May 30th, but failed to live up to the promise. It looks more and more like the new administration is taking up right where the old one left off-- cynically making promises it has no intention of keeping.

It remains to be seen whether these additional voices will persuade Messrs. Chamberlin, Grizzle and Reilly to do the right thing. Recent signals from the 12th Floor are mixed: Mr. Reilly is apparently willing to replace "worn-out" carpet with non-4-PC (non-4-phenylcyclohexene) carpet. The Union remains willing, as always, to help define the conditions under which that replacement takes place, including, e.g., definition of "worn-out" carpet.

The carpet arbitration fund is growing, standing at over \$300 at present. Thanks to those who have contributed so far, and please keep the support coming. We cannot afford to be too optimistic In These Times.

REMEMBER THE HOMELESS AND NEEDY --



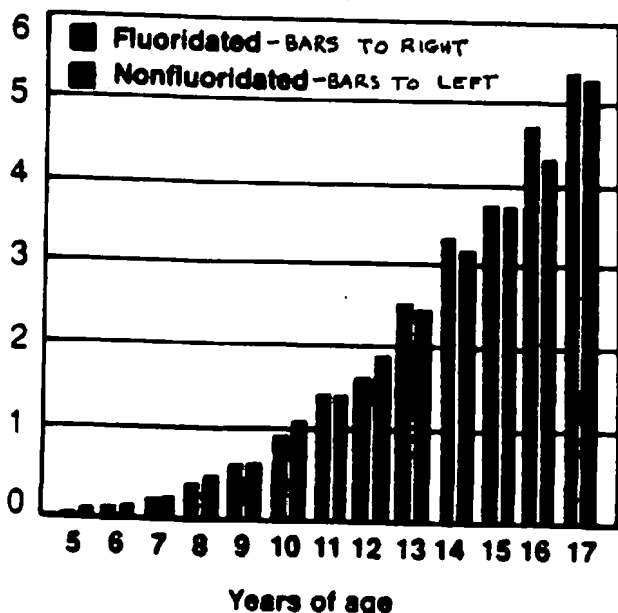
REPORT SHOWS TOOTH DECAY IDENTICAL IN FLUORIDATED AND NON-FLUORIDATED AREAS

An analysis of the largest data base ever collected on the rate of tooth decay in children versus their fluoride exposure shows tooth decay rates are identical in fluoridated and non-fluoridated communities. This analysis was presented on May 1st at the National Press Club by Dr. John Yiamouyiannis, an internationally known expert on the health effects of fluoride exposure. Dr. Yiamouyiannis has submitted his analysis to the Journal of Community Dentistry & Oral Epidemiology.

Chemical & Engineering News, which did the breakthrough investigative report in August of 1988, graphed some of the data from Yiamouyiannis report which is shown below (Note that for each pair of bars shown in the Figure, the right bar represents data for fluoridated water, while the left bar represents nonfluoridated water). Dr. Yiamouyiannis' report was based on an analysis of data collected by the National Institute of Dental Research (NIDR) during 1986-87 that was hidden from the public and uncovered by Dr. Yiamouyiannis under a Freedom of Information Act request. The data were collected from a study of over 40,000 U.S. children, ages 5 through 17, which correlated the number of cavities with fluoride in drinking water. The latest abstract of the report states:

Tooth decay rates appear unrelated to fluoridation

Average decayed, missing, and filled permanent teeth per child



Note: Averages are for the U.S. only. Areas where the fluoridation status was mixed or changed at some time since 1970 have been omitted. Source: National Institute of Dental Research data analyzed by John Yiamouyiannis

"The average number of decayed, missing, and filled permanent teeth (DMFT) per child was 1.96 in the fluoridated areas, 1.99 in the nonfluoridated areas, and 2.18 in the partially fluoridated areas."

This finding by Yiamouyiannis runs counter to the claims of the medical establishment which claimed as recently as last year that fluoride in drinking water reduces cavities 40 to 60 percent. However, according to the Boston Globe (6/19/89), NIDR has just rushed to complete their own study using the very same data as Dr. Yiamouyiannis. This new unpublished study uses a new measurement parameter - "decayed, missing, and filled surfaces", instead of the traditional "decayed, missing, and filled teeth". NIDR's study claims a benefit of 18%. Referring to their previous claims of a 40 to 60% benefit, American Dental Association spokesman Rick Asa said: "We're probably going to have to revise our numbers." (Atlanta Journal 5/23/89).

**TOGETHER--We WILL
Make a DIFFERENCE !**

NFFE ASKS REILLY TO SUSPEND SUPPORT FOR FLUORIDATION AND REEVALUATE THE RISKS AND BENEFITS OF FLUORIDE EXPOSURE

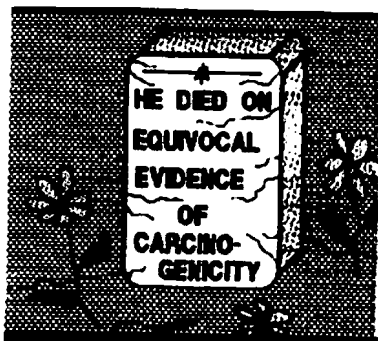
At the May 1st press conference, where Dr. Yiamouyiannis released the results of his new study on dental decay and fluoridation, Dr. Bill Hirzy, President of NFFE Local 2050, released a letter dated April 27th and written to Mr. Reilly, EPA Administrator, calling for EPA to "immediately suspend (not revoke) EPA's unqualified support for fluoridation, and begin an assessment by EPA scientists, of the risks and benefits of fluoride exposure. Noting that NFFE has been concerned for some time that fluoride has not been honestly evaluated, Dr. Hirzy pointed out that EPA based its science on a report from the Surgeon General which appears to have taken politics into account when deciding on an acceptable safe level of fluoride exposure. He cited an article in the Medical Tribune (4/20/89) which revealed that a panel of experts convened by the Surgeon General to review the health effects of fluoride exposure for EPA recommended in private session that the safe level be set below 0.5 ppm. They noted, however, that "We can't just talk about safety." and proceeded to endorse a level of 4 ppm for adults and 2 ppm for children.

NFFE TO GIVE FLUORIDE BRIEFING FOR DAA FOR WATER

At the request of Bill Whittington, Acting Deputy Assistant Administrator for Water, Dr. Bob Carton, who recently became President of NFFE Local 2050, will be giving a briefing on July 6th to Mr. Whittington on NFFE's concerns about the scientific basis for the fluoride in drinking water standard. This request came in response to NFFE's letter asking Mr. Reilly to suspend support for fluoridation and reexamine the risks and benefits of fluoride exposure. According to staff members in the drinking water office, ODW is planning a review of the scientific literature this year and will be considering whether or not to revise the current standard. Dr. Carton said, "I am encouraged that Mr. Whittington wants to hear our side of the story. Perhaps now we can approach this issue on a scientific and thoroughly professional basis."

CORRECTION TO THE MARCH FISHBOWL STORY ON FLUORIDE

In our March issue, we reported on a paper by John Colquhoun that questioned the validity of the original work on fluoride by H. Trendley Dean, the "Father of Fluoridation." Dr. Colquhoun, whom we met at the press conference on May 1st (see article elsewhere in this issue), read the story and pointed out an error in our discussion of his paper. He noted that the graph (Figure 2 in the Fishbowl) was prepared by plotting all the data on the rate of tooth decay versus fluoride taken after Dean's study. Dr. Colquhoun did not mean to imply that Dean had this data, but that the lack of correlation found in all the studies after Dean throws the results of Dean's study into question. (Dean claimed very good correlation). Dr. Colquhoun did point out that Dean had data on tooth decay from over two hundred locations which he did not publish. No one knows what happened to that data or if Dean handpicked the data to create the curve he published. The lack of correlation found in the studies following Dean's work creates a good deal of suspicion about Dean's original work.



**TOO FREQUENT
AN OCCURRENCE !**



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TIME FOR EPA TO BEEF UP RECYCLING!

As you may recall, NFFE Local 2050 endorsed and lobbied for the excellent legislation passed by the D.C. Council requiring recycling by commercial and residential buildings. Will **EPA** be fined for not complying with the recycling law? It will, if something does not start happening very soon!

SUMMARY OF THE D.C. MANDATORY RECYCLING BILL 7-301

1. By October 1, 1989, all **commercial** buildings shall recycle all newspaper and all paper (typing paper, envelopes, etc.).
2. By October 1, 1990, all **commercial** buildings shall recycle all glass and metal (undefined).
3. By October 1, 1989, all **residential** newspapers and yard waste shall be recycled.
4. By April 1, 1990, all **residential** glass and metal shall be recycled.

Mandatory Recycling Targets for D.C.

1. Must recycle 15% (by weight) of total waste stream by October, 1990.
2. 35% by October, 1992.
3. 45% by October, 1994.

Other Major Features

- D.C. must buy recycled paper if it is within 10% of the cost of virgin paper, with targets of 15% recycled by October, 1990, 30% by October, 1991, and 45% by October, 1992.
- D.C. must use composted materials from yard waste in parks, etc.
- A recycling surcharge on garbage will pay for the recycling program.
- Buy-back recycling centers are to be established in D.C.
- An Office of Recycling is to be created in D.C. for promotion, education, and enforcement.

What this means is that EPA Headquarters and all other Federal buildings in the District must recycle **all** (not some, or most) of their paper and newspaper by October, 1989, or face the consequences, including mandatory fines and possible refusal of permission for collection or disposal of any garbage. In addition, local environmental groups may sue the U.S. Government for failure to comply, since 42 U.S.C. 6961 (Solid Waste Disposal Act) says that **all** Federal facilities must comply with local solid waste requirements. Currently, EPA recycles about one-half of its white paper waste, but **none** of its waste from envelopes, colored paper, newspaper, cardboard boxes, or other paper. Given the current state of affairs at EPA Headquarters, to be in compliance by October 1, 1989, EPA has a very long way to go in a very short period of time! For more information on this topic, contact Charlie Garlow at 475-8694.



INDOOR AIR NEWS - - -

-by Myra Cypser

DAYTIME RENOVATIONS ANNOUNCED

On May 23rd, John Chamberlin, Director of the Office of Administration, sent a memorandum to all WSM employees announcing that renovations would be done during normal work hours because Town Center Management (TCM) had been experiencing increased costs. NFFE Local 2050 responded in a letter of May 25th asking Mr. Chamberlin to consider the cost of employee illnesses that could result from such a change to daytime renovations and called for bargaining on this issue. A few days later, the Agency agreed to negotiate a "Memorandum of Understanding" (MOU) on daytime renovations

with NFFE. This MOU will specify the conditions under which renovations may be done during work hours. TCM is still doing minor renovation work during work hours, presumably against the wishes of the Office of Administration. Readers are asked to report any daytime renovations to that EPA office and, also, to NFFE Local 2050 at 382-2383. Attempts to hold an open meeting so employees can advise the unions on bargaining positions have so far been unsuccessful, but a meeting will be held soon.

LIBRARY VENTILATION REPAIRS

Work is underway to repair the ventilation system for the main library, the law library, the photo lab, and the stress lab on the second floor of the Mall. The Facilities Management and Services Division announced at the May 30th Facilities meeting that these repairs will cost EPA \$250,000. Mechanical units, fans, and ductwork are being replaced. In response to questioning, a Facilities representative admitted that in designing the replacement system, they had not considered whether it would bring in enough fresh air to meet the ASHRAE fresh air standard. The Union's contract with the Agency specifically requires EPA's compliance with this standard. The Agency has yet to make any physical changes to any of the ventilation systems in Headquarters' buildings to bring in more fresh air.

HEALTH SURVEY RESULTS DUE

On February 13th, the Agency began conducting an "Indoor Air Quality and Work Environmental Study." As part of this study, thousands of EPA Headquarters' employees filled out survey questionnaires about their health and working environment. The Environmental Health and Safety Division (EHSD) first estimated that preliminary survey results would be ready for release in May; however, this estimate has been changed twice. Preliminary results are now scheduled for release "this summer" and the final results for early "next year." It is likely that EHSD already has some of the survey data compiled because the location of air monitors for the monitoring conducted in March was supposedly based on survey results. NFFE Local 2050 submitted a formal information request to the Office of Administration and Resources Management on June 16th to obtain release of the survey. The Agency has not yet responded to this request.

FRESH AIR MEASUREMENTS

A comprehensive study of 32 air-handling units was scheduled to be completed "by November" according to a memorandum of August 10, 1988, from former Administrator Lee Thomas. A contractor for EPA's EHDS has been conducting this study; however, it is significantly behind schedule. The goal of the study is to gather the information necessary to ensure that fresh air requirements are met on a continuing basis. NFFE Local 2050's information request of June 16th also asked for all available information on this study, including draft results. If this study shows that the building does not have enough fresh air, the Agency should commit to spending whatever funds are necessary to improve the ventilation system or, alternatively, move us to a different building.

POISONED EMPLOYEES

NFFE Local 2050 has been supporting the Committee of Poisoned Employees (CPE) in their efforts to obtain adequate alternative space and improvements in air quality. (On June 8th, NFFE and CPE sent a joint letter to Congressman Michael L. Syar, Chairman of the Subcommittee on Environment, Energy and Natural Resources, on these issues. Members of CPE "articled" WSM on June 14th, and in an open letter to William Kelly, the Administrator, asked him "to designate someone in [his] immediate office to take charge" and "clean up the air at Headquarters." Not all the CPE members can use the alternative space provided by the Agency. While the apartments have windows that open, they do not have individual air-handling units; rather, air is recirculated throughout the building and the employees are exposed to the pesticides, smoke, paint fumes, etc., in the entire building. Some CPE members may be fired in the near future, when they can no longer be on leave without pay.

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RELEASE OF FUMES IN THE EAST TOWER

On June 16th, there was a release of fumes in the East Tower when a Town Center Management contractor applied a sealer containing xylene on the roof near one of the air intake dampers. Fumes penetrated many floors of the East Tower and several employees reported to the Health Unit. The Facilities Management and Services Division (FMSD) issued a letter to all WSM employees the same day apologizing for the discomfort the incident may have caused and said that the Environmental Health and Safety Division (EHSD) will be reviewing material safety data sheets for products to be used in the building. FMSD is commended for this timely and reassuring communication. However, it is not clear what, if any, procedures EHSD has for evacuating employees or granting administrative leave for these types of incidents.

OTHER INDOOR AIR COMMITMENTS

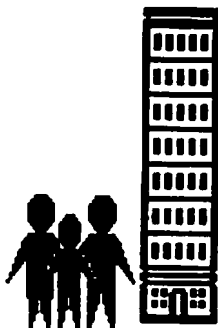
We understand that the Facilities Management and Services Division is still drafting an indoor air quality management plan. This plan was promised in a desk-to-desk memorandum of July 22, 1988, from John Chamberlin. Employees were assured at a recent Facilities meeting that this plan will be issued soon. We are also waiting for an inventory of our building's pollution sources. This inventory was promised in a memorandum of August 5, 1988, for all Headquarters' employees from Charles Grizzle, Assistant Administrator for Administration and Resources Management. In addition, we had a verbal commitment at the Facilities meeting of October, 1988, that the Environmental Health and Safety Division would conduct an investigation of the mist from the ventilation cooling towers that "rains" on the child care center playground and is possibly contaminated with pesticide. This was to be done when the air conditioning was turned on in 1989.

PRESS COVERAGE

At least 49 newspaper articles have been published on our indoor air story since April, 1988. Our story was told on at least seven national TV shows. In addition, it was reported by at least four weekly news magazines with international audiences and three scientific journals. We know of some wire service newspaper articles, radio shows, and local TV shows. Of course, we do not know the full extent of media coverage. Yet, despite all of the attention, despite petitions, rallies, appeals to Congress, etc., we still do not have an adequate indoor air program for Headquarters' buildings. The Environmental Health and Safety Division has been slow to implement key program elements: the health survey, fresh air measurements, and the pollution source inventory.

FACILITIES MEETING

THE NEXT FACILITIES MEETINGS ARE TENTATIVELY SCHEDULED FOR JUNE 27TH AND JULY 25TH, 10 A.M. IN CONFERENCE ROOM #2, NEAR THE WIC. We would like the Office of Administration to have a greater interest in indoor air issues. If more people who are concerned about indoor air came to the Facilities meetings, it might make a difference. See YOU there!



TOGETHER--We WILL
Make a *DIFFERENCE* !

Join NFFE Today!



GUEST EDITORIALS *

* Views expressed in Guest Editorials are those of the authors; they do not necessarily represent those of NFFE Local 2050 or its members.

HOW MUCH "IMPORTED POISON" SHOULD WE ADD TO OUR ENVIRONMENT?

by Alex Arce

Several "developed countries" are now entering the pesticide products market in the United States. These products, which will soon be introduced into our environment, fall into the category of hazardous "economic poisons" because although their purpose is to poison pests and to obtain an economic advantage, such as food production, they also introduce hazards into our environment. Due to my past experience in the areas of pesticide toxicology and regulation, I personally believe that a certain amount of pesticide use is needed in the United States for pest control and that we derive multiple benefits from the use of them. My belief is that if the benefits of a particular pesticide are greater than its risks in terms of health and/or environmental effects, then the use of that particular "economic poison" is desirable.

The United States, most likely, produces more pesticide products than any other country in the world. We also have (or used to have) the highest standard of living. Perhaps, we can still rightly claim to have a greater degree of comfort in our lives than that afforded the citizens of other countries. In part, such advantages may be traced to the judicious use of pesticides in our production of abundant food crops. Few of us know or have experienced true hunger, but that serious condition unfortunately still exists in many other parts of the world. Thus, I personally do not question the production and use of regulated "economic poisons" in the United States, but I do question the need to import additional new pesticide products from foreign countries when our population already complains of an overt pesticide (poison) burden. In my view, such importation may result in the following effects:

1. Overburdening our already overtaxed environment by adding "new" pesticides (that are either not needed or already produced in our country) which will enter our land, water, and air.
2. Increased potential for deleterious effects from these substances on our total population (human, animal, plant, and insect).
3. Increased danger of pesticide spills at sea, similar to the one produced by the oil tanker in Alaska, if the imported pesticides are transported by that likely route, or spills by trucks travelling roads through heavily populated areas.
4. Introduction of an unnecessary economic burden on our own pesticide industry, having undesirable employment and social consequences.

I personally question the inclination of these other "developed countries" that wish to export pesticides to the United States to reciprocate, allowing us to export our own pesticide products to those countries. Finally, the real question would appear to me to be the following: Given the current levels of domestic pesticides currently used in the United States, do we really wish or need to import new products from other countries? My own answer to that question is "No."

Alejandro (Alex) Arce works within the Registration Division, Office of Pesticide Programs.

WHY JOIN?

by Dwight Welch

I could begin this editorial by asking you how you enjoyed your last day off as a result of the Compressed Work Week. I could then lay a guilt trip on you by pointing out that it was the Union that fought for and won the Compressed Work

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Week for all employees. I could also point out how the Union is constantly fighting for better and more healthful working conditions, such as the fight for the elimination of toxic carpeting or the struggle to prevent packing us into our buildings like a bunch of sardines. I could also tell you how, should you have a severe problem with your boss, the Union will be there to help you prepare and file your grievance. But let's face it: whether or not you join, you will still enjoy the benefits of the Compressed Work Week, the benefits of a healthier work environment, and the Union must help you with that grievance. As unfair as it seems, right here at the EPA, there is such a thing as a free lunch! A small but dedicated minority is fighting for the benefits also enjoyed by the apathetic majority.

So this article is not aimed at the "free lunchers." This article is aimed at the free luncher's opposite: the environmental activist. The "Sierra Club-types." Those dedicated type of people who take a look around them and say, "Hey, the Agency isn't doing enough to protect the environment." So they join the Sierra Club or some other environmental group and do that extra bit to help make this a better world. And the world sorely needs these people! Industry heavily lobbies EPA to push the Industry agenda and the Sierra Clubs and the NRDCs of the world are needed to offset this type of pressure.

So my question to you committed environmentalists: "Have you considered joining the premier environmental group? Have you considered joining NFFE Local 2050?" Now, you may be saying to yourself, "Premier environmental group? Give me a break! Many environmental organizations have memberships in the thousands, even millions; NFFE Local 2050 has far fewer members than that!" And that's just the point. Just look at what such a small group of people has accomplished. When you measure the gains realized against the number of people participating, Local 2050 has an agenda to membership ratio that can't be topped!

But we have a clear-cut advantage that other groups don't have. We are on the inside. So you may say to yourself, "Well, I'm on the inside; I can forward those goals that I believe in." I can relate to that. For years I have played the "Lone Ranger," firing off memo after memo to this manager or that, whenever I thought that the principles upon which EPA was founded had been violated. But playing the "Lone Ranger" doesn't make it: you can be ignored; your memos can get "trashed." In the Union, one has brothers and sisters with common interests. Together, as a group, we can accomplish more than as individuals.

So, you're still skeptical! Just what has Local 2050 done on National environmental issues? How about fluoridated water? Long an issue of extremist fringe groups, the scientists in the Union looked at the facts. When they discovered that tooth decay rates in areas with unfluoridated water were virtually the same as in areas with fluoridated water, they realized the benefits side of the equation was nearly zero, or at least should be reevaluated. Compared to the health risks, especially to youngsters who drink a disproportionate amount of water relative to their body weight, the risk/benefit ratio now becomes an issue worth looking into. Union scientists unflinchingly put the facts before the politics. Fluoridation is probably not a "commie plot," but is it a worthwhile program?

Many national groups have long demanded that EPA put science ahead of politics. The Union has helped to lead this charge. Striving for professionalism and integrity has been part of our platform since the Union's inception here at EPA.

What about air quality? Many national groups have realized a challenge to be faced in the late 20th century is the poor air quality in sealed up buildings. Buildings such as those in which EPA is housed. Again, NFFE has been on the forefront of this issue. While our Administrator has been talking up the new and improved Clean Air Act, the Union has been saying, in effect, "Wait a minute, Mr. Reilly, how about the air in our own buildings? How about our own employees who are getting sick from the poor air quality in these buildings?"

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I could go on about Local 2050's accomplishments, but it is now 7:30 PM and the ventilation in Crystal Mall #2 has been shut down for nearly 3 hours, and I'm beginning to feel nauseated breathing this atmosphere of stagnant, stale air.

So how about it EPA professionals? Can you look yourself in the mirror and say, "I'm doing all I can to improve the environment?" Or are you going to let the other guy do it? Please join Local 2050 and make a difference!

Dwight Welch works within the Registration Division, Office of Pesticide Programs.

NFFE LOCAL 2050 INSTALLS NEW OFFICERS FOR 1989-1990

Local 2050 of the National Federation of Federal Employees held its annual election in May, and installed the newly elected officers on June 7th. Bob Carton is the new President, moving up from President-Elect. Bill Hirzy is the President-Elect, and will succeed to the presidency next year. Three Vice-Presidents were re-elected: Mark Antell, Rufus Morison, and Jim Murphy. Three new Vice-Presidents joined the Executive Board: Sal Biscardi of the Office of Toxic Substances (OTS), and Irv Mauer and Dwight Welch of the Office of Pesticide Programs (OPP). Francine Ten Eyck of OTS is the new Secretary, with Daljit Sawhney continuing as Treasurer. Hale Vandermer of OPP is the new Chief Steward. The names and telephone numbers of all of the newly elected officers are listed elsewhere in this issue of the Fishbowl.

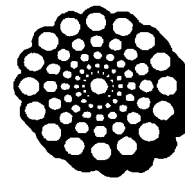
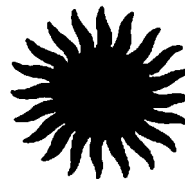
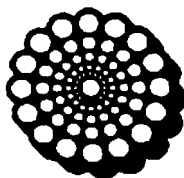
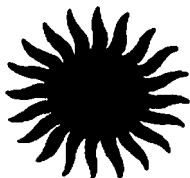
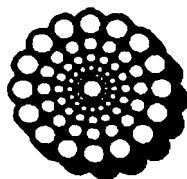
Bill Hirzy gave a brief review of Local 2050's accomplishments during the past year, focussing primarily on the Union's successful negotiation of a permanent, uniform COMPRESSED WORK WEEK PLAN for its bargaining unit. Refreshments were served for all tastes—from chips, cake and cookies to yogurt and fresh fruits.

WILL EPA AGAIN DISCRIMINATE ON THE BASIS OF AGE?

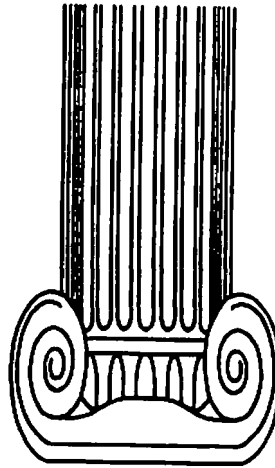
In the recent past, EPA was found guilty of discriminating on the basis of age, hiring younger employees (at lower salaries) in preference to older, more experienced workers (who would command higher salaries). The following is the text of a memorandum sent by Dr. Robert Carton, President of NFFE Local 2050, to Administrator Reilly on June 19, 1989:

"Dear Mr. Reilly,

We take exception to your memorandum at all EPA employees of May 12, 1989: "FY 1989-1992 Affirmative Action Policy and Program Objectives." Specifically, the policy appears to totally ignore age discrimination in its stated "Goals and Objectives." While noting that EPA "shall take affirmative action to remedy the effects of past discrimination," the memo ignores "age" - the one area in which EPA was forced to concede (after legal action was taken against it) in a posting throughout Headquarters that it practiced widespread discrimination. We suggest that the policy be reevaluated and revised toward a goal of preventing the one form of widespread discrimination known to have occurred at EPA. We would be happy to work with you in this effort."



CURRENT NFFE LOCAL 2050 OFFICERS



PRESIDENT:
 PRESIDENT-ELECT:
 VICE-PRESIDENTS:
 NFFE PHONE 382-2383
 SECRETARY:
 TREASURER:
 CHIEF STEWARD:

BOB CARTON 382-2325
 BILL HIRZLY 382-2327
 MARK ANTELL 382-2878
 SAL BISCARDI 382-4288
 IRV MAUER 557-7430
 RUFUS MORISON 382-4273
 JIM MURPHY 382-7591
 DWIGHT WELCH 557-2783
 FRANCINE TEN EYCK 382-3562
 DALJIT SAWHNEY 382-4289
 HALE VANDERBERG 557-7336