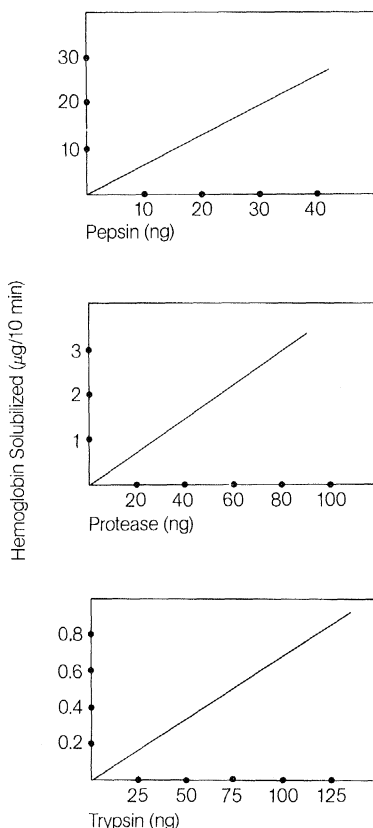


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- National Technical Information Service, Springfield, Va.).
5. J. M. Gallagher, R. Barany, P. F. Paskert, R. G. J. Zimmerman, "Resource requirements, impacts and potential constraints associated with various energy futures" (annual report to the Energy, Research, and Development Administration, Bechtel Corporation, San Francisco, March 1977; available from the National Technical Information Service, Springfield, Va.).
  6. P. F. Paskert and J. M. Gallagher, "Escalation in the costs of manpower, materials, and equipment needed for energy facilities" (Bechtel Corporation, San Francisco, October 1977; available from the National Technical Information Service, Springfield, Va.).
  7. J. M. Gallagher, R. Barany, P. F. Paskert, R. G. J. Zimmerman, "Resource requirements, impacts and potential constraints associated with various energy futures" (annual report to the Department of Energy, Bechtel National, Inc., San Francisco, August 1978; available from the National Technical Information Service, Springfield, Va.).

## Chemical Industry and Regulation

Philip H. Abelson's editorial, "Regulation of the chemical industry" (3 Nov., p. 473) describes problems for both the chemical industry and individual chemists and chemical engineers working in the industry. In view of the enormous quantities of chemicals manufactured and their wide distribution, these practitioners should be commended for their efficient use and disposal of chemicals to date. The uncertainty about toxic effects from chemicals in our environment, including the manufacturing facilities, suggests that the industry and chemists should not be subject to undue regulation at this time but instead should be given recognition for their effective track record. Regulation of the industry and the licensing or registration of chemists, as proposed in some states, does not appear justified except in cases where chemical use is directly related to the health of the public.

The American Institute of Chemists, through its new National Certification in Chemistry and Chemical Engineering, endorses the concept of encouraging voluntary self-development through continuing education and professional activities to offset technical obsolescence and to recognize those who make the extra effort to demonstrate their responsibilities within the profession. We believe this to be the preferred course for the profession to take in seeking solutions to the problems identified in Abelson's editorial. It may be true as pointed out in the editorial that there will be thousands of toxicologists obtaining their livelihood from the study of the toxicity of the products of the chemical laboratory. We would rather hope that this proliferation, which will be an added burden to the industry and to the consuming public who will eventually have to pay the costs, can

be offset by evenhanded government policies established with the cooperation of the chemical societies. The president of the American Chemical Society, Anna Harrison, has worked extensively to fill this need and has done so with considerable success. Chemists, chemical engineers, and the chemical industry have shown responsibility for their activities in the past. I believe we can expect them to do so in the future.

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I am prompted to respond to Abelson's editorial wherein he relates the woes of the chemical industry that result from federal regulations. I take issue with the generally negative tone of the editorial and suggest that if Abelson wished to get a true feeling for the impact of federal regulation on chemical companies and the impact of chemical companies on the public, he made a basic error in visiting "six of the major industrial laboratories in the United States." To gain greater insight into the magnitude of public danger and the nearly insurmountable obstacles to efficient regulation, he should have visited some of the literally thousands of small and medium-sized chemical manufacturers which are virtually unregulated.

There seems to be a general image fostered by the industry that chemists are overworked, dedicated scientists hampered in their lifesaving research by overzealous, uninformed federal inspectors wielding unreasonable demands for quality and safety. As a manufacturer falling under the scrutiny of three federal agencies, I have yet to encounter a regulation that was not based on a sound knowledge of the field, or that imposed unreasonable demands on the manufacturer. Almost without exception, the "unreasonable" demands are those that prevent the companies from taking dangerous shortcuts.

Chemical manufacturers are profitable corporations, and they will resist any regulation that might diminish profit. If safety and accountability become the watchwords of the industry, it will only be after years of federal and public insistence have molded corporate policy and structure to ensure that safety and accountability are cost-effective.

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