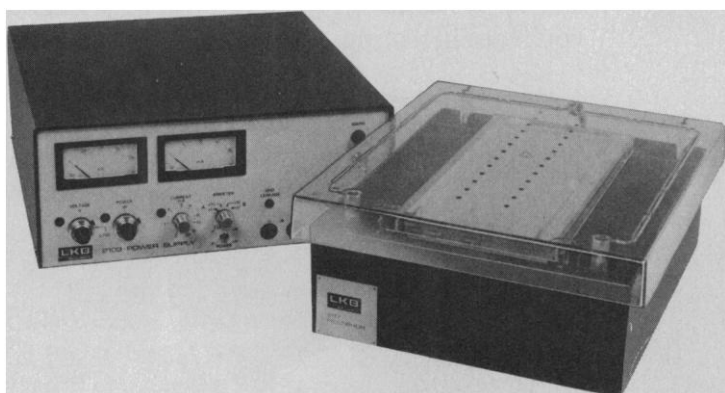


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LETTERS

TCDD in Coal Fly Ash

Scientists at the Dow Chemical Company are naturally interested in the report by B. J. Kimble and M. L. Gross (4 Jan., p 59) "Tetrachlorodibenzo-*p*-dioxin [TCDD] quantitation in stack-collected coal fly ash," in which the authors extrapolate one data point to show that 2,3,7,8-TCDD was not present in fly ash from a "modern power plant." They then extrapolate this result to support a statement that a conclusion reached by Dow scientists in an earlier report (1) was "invalid." To resolve the apparent differences we asked the authors to collaborate with us in sampling and analyzing fly ash from the same power plant. We were told that they were not free to disclose the name or location of the powerhouse. We then attempted to obtain the information using the Freedom of Information Act through the Department of Energy (DOE), which operates the Laboratory for Energy-Related Health Research (ERHR) at the University of California, Davis. The reply from DOE states that they checked with the director of ERHR at Davis and conclude that "we have no document or record of any kind which gives the location of the 'commercial coal combustion facility' and I [David A. Smith] do not know its location." Regardless of the quality of the work, the integrity of the report is thus placed in jeopardy, since the source of the sample cannot be identified, and confirmation of the result cannot be made.

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References

1. The Chlorinated Dioxin Task Force, *The Trace Chemistries of Fire—A Source of and Routes for the Entry of Chlorinated Dioxins into the Environment* (Michigan Division, Dow Chemical Company, Midland, 1978).

Time and Effort Reporting: Déjà Vu?

On 6 March 1979, the Office of Management and Budget (OMB) issued a revision of circular A-21. It is the government's theory that it reimburses universities for costs incurred for research only if it agrees that the costs are allowable. Circular A-21 describes criteria for allowability of such costs at educational institutions. The new version requires effort reports, accounting for the time, or "workload," or "effort" of faculty

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