to spray Larvadex directly on the manure.

California may protest EPA's action as well. It is one of a score of states where Ciba-Geigy has been pushing to have Larvadex registered for use on an emergency basis. So far, the California Department of Food and Agriculture has declined. "We'd probably register it tomorrow as a spray-on" says Keith Maddy, the department's chief of toxicology. But at present, Maddy says, the department is not persuaded that the benefits of using Larvadex as a feedthrough would outweigh the risks.

Last year, Maddy says, "We proposed to EPA that they hold a national symposium on feed-through pesticides. We have questions about those already registered and about the four or five coming down the pipeline." EPA did not respond. In written comments, California may praise EPA for laying out its Larvadex decision in a straightforward manner, according to Maddy, but it may also request a longer comment period and perhaps public hearings.

It is apparent that EPA would like to chip away at the edges of the Delaney clause. Whether the interpretation offered in the Larvadex case will be accepted or not remains to be seen. However, EPA's critics agree that the agency has earned goodwill because of the candor with which it has presented its case. —ELIOT MARSHALL

New Directions for TVA?

With the retirement this month of Tennessee Valley Authority (TVA) director S. David Freeman, President Reagan is to announce what will be his second appointment to TVA's three-man board. The appointment is of some significance as it could influence the agency's course for the next decade on several key issues.

The most likely candidate for the 9-year term is John V. Waters, who has been promoted by Senator Howard Baker (R-Tenn.). Waters, a Tennessee businessman and former Baker campaign manager, is president of the Tennessee Bar Association, a former cochairman of the Appalachian Regional Commission, and a member of the board of the controversial Tennessee-Tombigbee stream channelization project.

Waters' emergence has aroused consternation among the members of the TVA Board Appointment Coalition, which represents 43 groups involved in environmental, economic, and social issues. The coalition has been attempting to

Some fear that public participation and environmental gains will be jeopardized by departure of David Freeman from TVA board.

influence the appointment and has tried to promote candidates it favors, including John Gibbons of the Office of Technology Assessment. Although Baker had consulted with the coalition, he did not notify it of his choice.

Jim Price, Southeast representative of the Sierra Club, says the coalition is concerned that the "fragile and tenuous" commitments to the environment and to increased public participation in TVA policies could be jeopardized with the departure of Freeman.

The federally owned TVA was established in 1933 as a massive, multipurpose, pathbreaking venture to spur the development of one of the country's most backward regions, primarily through a series of dams for cheap power, flood control, and navigation. Included in its mission was reforestation, erosion control, and promotion of fertilizer use.

Despite its early accomplishments the agency has recently come under fire from a variety of critics. For example, environmentalist William Chandler in a new book, *The* Myth of TVA, says the agency became a major polluter and strip miner—more than half the energy generated comes from the valley's high-sulfur coal—and resisted federal environmental laws as strenuously as any private utility. Chandler and others also argue that TVA has been plagued by inefficiency owing to its lack of accountability both to the public and the marketplace.

Freeman, appointed to the board by President Carter in 1977, succeeded in making major changes. He brought TVA into compliance with federal laws and initiated new pollution-fighting strategies. He also pushed an extensive energy conservation program which contributed to TVA's decision to cancel future nuclear power plants.

TVA has been primarily guided since 1978 by Freeman and Richard Freeman (described by the coalition as an "enlightened businessman"). The third board member and current chairman is Charles Dean, from the Knoxville utilities board, who was selected by Reagan in 1981. Dean, according to observers, is not known as an imaginative or forceful manager. Thus, the new appointment is seen as being highly significant for the future of TVA.

For many years TVA has been a paternalistic force, a major employer and focus of the valley's economy. But it appears there are limits to what economic miracles cheap power can bring about. Chandler analyzed per capita income, rural electrification, and agricultural development and found that the area using TVA power had not made any greater gains than surrounding counties. Now, say environmentalists and others, it is time for TVA to diversify and promote renewable energy technologies, new farming techniques, and other measures to stimulate grass-roots economic development.

Mohamed el-Ashry of World Resources Institute, who was director of TVA's environmental program until last year, says, "TVA has done all it can do in cheap power production. Now its reason for being should be as a national proving ground for innovative energy technologies, environmental protection, and resource management."

The future will depend in large part on the extent to which organized public opinion is allowed to affect deliberations at TVA. Board meetings were opened to the public a few years ago, but further mechanisms are needed to facilitate public participation. Educating the public is also a problem. "There is tremendous apathy in the valley," says el-Ashry. "People don't scream except when they raise the rates."—CONSTANCE HOLDEN