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SERVING THE ENERGY INDUSTRIES WORLDWIDE

JUN 11 1997

Dick Cheney
Chairman of the Board.
President and
Chief Executive Officer

May 30, 1997

TO
Katie
McGinty
CEO

The Honorable Albert Gore, Jr.
Vice President of the United States
Office of the Vice President
Old Executive Office Building
Washington, DC 20501

Dear Mr. Vice President:

As Chief Executive Officer of one of the world's largest diversified energy services, engineering, maintenance, and construction companies, I am writing to express my grave concern about the U.S. Environmental Protection Agency's proposed new standards for ozone and particulate matter. Implementation of these standards would cause great harm to consumers, my own industry, and the U.S. economy and will still not deliver the promised significant enhancement of health protection to the American public.

I am concerned that the proposed standards have not been based on solid scientific evidence. The best proof of this fact comes from EPA's own Clean Air Scientific Advisory Committee (CASAC), which reviewed a number of more stringent ozone standards and one approximately as stringent as the current standard. It concluded that none of the standards is "significantly more protective of public health" than any of the others. Indeed, CASAC noted that it is not possible to set a standard that would eliminate all biological responses to ozone, because some people react to ozone even at background levels. This does not mean that we should do nothing to continue to reduce ozone. In fact, under the Clean Air Act, ozone levels have declined--dramatically in some instances--in nearly every U.S. urban area, and ozone emissions will continue to be reduced well into the next century.

Likewise, in regard to the proposed standard for particulate matter (PM), scientific justification is lacking. According to CASAC, "our understanding of the health effects of PM is far from complete." Although EPA claims that hundreds of studies support its proposed standards, only a few of the studies have data on the particulates that EPA wants to regulate. In the case of one study that EPA regards as key, the chief researcher refuses to make available his underlying data--and EPA has rejected pleas from CASAC and Congress that it require him to release the information. EPA acknowledged these uncertainties in its FY98 budget submittal, requesting an additional \$26.4 million for PM research to "reduce the great uncertainties about PM's health effects."

The Honorable Albert Gore, Jr.

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In fact, the proposed rule-making on the particulate standard is being driven by court order rather than scientific evidence. EPA's notice in the Federal Register accompanying the proposed rule noted the "highly accelerated, court-ordered schedule" under which EPA reviewed the criteria and standards for particulates. According to CASAC, the "deadlines did not allow adequate time to analyze, integrate, interpret and debate the available data on this very complex issue."

It is clear that EPA is acting without an adequate scientific basis to justify these new standards. I urge you to counsel EPA to issue final rules which maintain the existing ozone and particulate matter standards so that unanswered questions regarding the scientific justification, benefits, costs, feasibility and alternatives to new air quality standards are addressed in full and open debate.

Sincerely,



Dick Cheney



EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY
WASHINGTON, D.C. 20503

June 16, 1997

Mr. Dick Cheney
Halliburton Company
3600 Lincoln Plaza
500 North Akard Street
Dallas, Texas 75201-3391

Dear Mr. Cheney:

Thank you for your letter regarding the proposed changes to the National Ambient Air Quality Standards for particulate matter and ozone. Please be assured that your concerns will be carefully considered.

As you may know, the Office of Management and Budget (OMB) is responsible for review of significant Executive Branch regulations under Executive Order No. 12866. Although OMB has not yet received the draft final rule for review, we have discussed it with various interested parties, including various State and local governments. We appreciate your views and will take them into account as we review the final rule. Your letter has been made part of the OMB record, we have forwarded a copy of it to the Environmental Protection Agency's Office of Air and Radiation, in accordance with OMB procedures, so that they will also be aware of your views.

Again, thank you for writing.

Sincerely,

Kathleen A. McGinty
Chair

KAM/pgu