

after the fact. Our system, we believe, can predict episodes before they occur and make it possible to prevent them.

The American Petroleum Institute is sponsoring a study of the feasibility, cost and effectiveness of this pollution incident control plan. The study is now underway in the most densely populated and most complex air shed in the nation, the New York metropolitan area. It is being conducted by Jackson and Moreland, a reputable, independent consulting engineering firm of Boston, Massachusetts. For several months Jackson and Moreland engineers have been gathering data from a wide variety of sources within New York City and outside it. They have interviewed business executives, city officials, and other individuals who either have expertise in pollution control or are responsible for particular pollution sources. They have contacted control officials and meteorologists, as well as experts from the academic world. Particular attention is being given to checking the weather forecasting aspect of the plan.

Dr. Leonard Greenburg, former New York City Commissioner of Air Pollution Control, is serving as a consultant to the engineers on this project. As you know, he is now chairman of the Department of Preventive and Environmental Medicine at the Albert Einstein College of Medicine in New York.

By the fall, Jackson and Moreland is scheduled to give us its judgment. I will not anticipate what that judgment will be.

The plan under study could only be implemented at a cost—but we believe it will be a minimum cost to accomplish what must be accomplished, protection against the possibility of health-damaging air pollution incidents.

That end, of course, could be achieved by the complete elimination of all pollutant sources—but this is impractical. What we have put forward is a plan that we feel is achievable now and that meets the urgent need.

The pollution incident control plan is not the answer to all pollution problems. It does not take into account other factors beyond health protection; it does not prevent corrosion, plant damage or soiling of clothing. Judgments on steps to take to deal with these latter effects can be determined on an economic balance—weighing value to be achieved against cost of achieving it.

Our plan is one solely dedicated to the elimination of the air pollution incident which holds the potential of health damage. We do not say: forget about the other effects of air pollution. We do say: let's get on with the job of eliminating this one very clear threat of health damage, and do so without delay.

In some cities year-round reduction of the total pollution load must be achieved. But no one has yet found a way to accomplish this overnight.

No delay, though, should be tolerated when it comes to dealing with the air pollution incident. Some way must be found, as we make our steady progress toward the reduction of total pollution, to assure that under adverse circumstances pollution incidents will never again occur in this country.

If our plan or some refinement of it is not the answer to the problem of the air pollution incident, one should certainly be found. And I believe you would agree that such a plan should be put into effect as promptly as possible. A long-term schedule for achievement of *this* goal is *not* reasonable.

We are proposing, then, what we hope will be a practical answer to the air pollution incident.

The feasibility study on the plan is just one of many efforts being conducted within the petroleum industry in the air conservation area this year.

Underway within the API are air pollution research projects costing well over \$1½ million in 1966 alone. Within individual companies of the industry another \$41 million is being dedicated this year to air conservation capital expenditures and research. An additional \$210 million has been spent in those areas by oil companies in the last ten years.

Knowing all that can be learned about sulfur oxide pollution and any other pollution problem that might be associated with the industry's operations or products is of very great concern to us. We are sincerely dedicated to air conservation, and we will continue to seek in every way possible to work with others from within industry, from within government, and from among the general public who are joined in the same cause.

Dr. ECKARDT. Very few large epidemiological studies have been undertaken because of their high costs and because they contain so many variables including substandard food, housing, and clothing.