10/30/90

To: William K Reilly

From Chris Dallery MD
Tuba City AZ 86045

re: Against Ethyl "HiTec" 3000

As a medical doctor working for the Public Health Service, I am firmly opposed to Ethyl "HiTec 3000".

Manganese is known to be a neurotoxin.
"HiTec 3000" is corporate irresponsibility at its finest.

Sincerely
Chris Dallery MD

Park Nicollet Medical Center

2001 Blaisdell Avenue South
Minneapolis, Minnesota 55404

October 28, 1990

William K. Reilly
Environmental Protection Agency
401 M Street Southwest
Washington D.C. 20460

Dear Mr. Reilly:

I have recently read that the Ethyl Corporation is beginning to use manganese to gasoline. As an enviromental physician, I think that this represents a potentially severe problem to the health of the people in the United States. As you know, manganese has been associated with severe neurologic problems. It is a well documented cause of a Parkinson-like syndrome. It is my hope that the EPA will not allow this additive to be used.

Sincerely,

David Parker, M.D., M.P.H.

DP/ncss/cak

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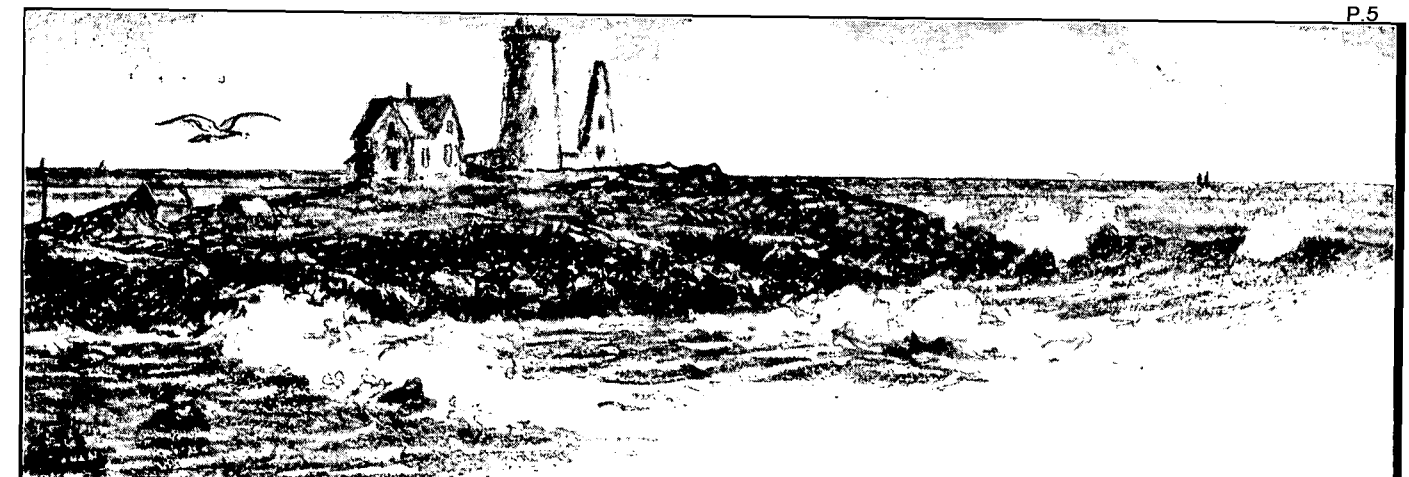
90NOV 5 P1:41



MR Reilly,

Please look to the future. The future of your grand children. The future of your grandchildrens children. Reject Ethyl's application to use MMT (methycyclopentadienyl manganese tricarbonyl) as an additive for gasoline. The use of this product will only cause a greater risk to the health of the environment. And darken your children's future considerably.

W.R.Cyr

Do The RIGHT THING

Roger Deschenes

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90NOV 1 P3:14

WILLIAM K. REILLY, ADMINISTRATOR
ENVIROMENTAL PROTECTION AGENCY
401 M STREET, S.W.
WASHINGTON, D.C. 20460

DEAR SIR:

I HAVE RECENTLY READ DETAILED INFORMATION ON Hi TEC 3000 PERFORMANCE ADDITIVE.

YOUR OFFICE SHOULD APPROVE HiTEC 3000 FOR IMMEDIATE USE IN GASOLINE TO HELP REDUCE AIR POLLUTION AND REDUCE IMPORT OF FOREIGN OIL.

SINCERELY,

ROBERT H. CHRISTENSEN

8911 CLUB ROAD
ST,LOUIS PARK, MN 55426

OCTOBER 30, 1990

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EPA
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38755
90NOV 1 P3:15

271 Florence Avenue
Arlington, MA 02174
October 26, 1990

William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: Ethyl Corporation of America
request for approval of gasoline additive
methycyclopentadienyl manganese tricarbonyl

Dear Administrator Reilly:

Ethyl Corporation of America's claims for the benefits of its gasoline additive "HiTec 3000" sound most impressive. However, the potential harm to human health from the manganese in this product should be cause for the EPA to reject Ethyl's application for the use of this substance.

Since manganese at high dose levels is a demonstrated human neurotoxin with irreversible pathological effects on the brain structure, we should not use the entire population of the United States in an uncontrolled experiment to determine the cumulative effect of long-term exposure. We already know the cumulative effect of long-term exposure to lead, another heavy metal; let us not repeat the same mistake with methycyclopentadienyl manganese tricarbonyl (MMT).

We, therefore, urge the EPA to reject Ethyl Corporation's request to use MMT as a gasoline additive.

Sincerely yours,

Leonard W. Silver Louise L. Silver

Leonard W. Silver and Louise L. Silver

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EPA
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38740
90NOV 1 A11:41

204 Fairmount Ave
Ithaca, NY 14850
Oct 25/90

Wm. Reilly
EPA
Wash., DC 20460

Dear Mr. Reilly,

I urge you to reject Ethyl Corporation's application to add manganese to gasoline, + to terminate all current such uses. We cannot afford another, drawn-out experiment involving the entire population of the U.S. like the disastrous 50-year experiment with lead in gasoline.

We're counting on you, as head of the Environmental Protection Agency to indeed protect our environment.

Thank you.

Sincerely,
Betsy Darlington

SIERRA CLUB

SIERRA CLUB CENTENNIAL 1892-1992

LONE STAR CHAPTER

6014 Woodbrook
Houston, TX 77008
Oct. 25, 1990

William K. Reilly
Env. Protection Agency
401 M St SW
Washington, D.C. 20460

Dear Mr. Reilly:

We are concerned about the addition of manganese to automobile gasoline. We would urge that you delay final consideration of this new additive until all the facts about health effects and automobile components are known. While the percentage by volume or weight of the additive may be small, the total quantities emitted by the fleet of cars of a major city turns out to be enormous. We feel that there is no need to rush into this decision at this time and would like to see better documentation of possible health and welfare impacts on the human population and the environment including bodies of fresh water and water supplies over the long term, studying cumulative effects.

Thank you for your consideration.

Yours truly,

George Smith

George Smith
Chair, Air Quality Comm.

Shanghai International Corporation (N. Y.)

EPA
Washington, DC
20460
Att: EPA Administrator William K. Reilly

Oct. 29, 1990

Dear Mr. Reilly:

RE: THE REJECTION OF MMT AS AN OCTAVE ENHANCING GASOLINE ADDITIVE.

Please reject the Ethyl Corporation's application to approve MMT (methycyclopentadienyl manganese tricarbonyl) as an octave enhancing gasoline additive.

MMT contains lead which is most harmful to humans if it settles within our backyards and playgrounds (most particularly to children). Please say "no" to their request of approving MMT as an enhancing gasoline additive for the sake of our children, at the very least.

Thank you for taking time to read my request.

Most sincerely,

Yolanda MacDermot

ONE WORLD TRADE CENTRE, SUITE 2833 NEW YORK, N. Y. 10048 U.S.A.
TEL: (212) 321 - 3220 TELEX: 239824 SHAI FAX: (212) 321 - 3226

RECEIVED
EPA
CORR. CONTROL
38704
90NOV 1 A10: 32

Suzan Filipek
421 Marine St. #A
Santa Monica, CA 90405

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Suzan Filipek

Suzan Filipek

Dear Administrator Reilly

I understand that the Ethyl Corporation is proposing to introduce a new additive for gasoline called "HiTec 3000." This proposed additive is a toxic. Its makeup is Methylcyclopentadienyl manganese tricarbonyl (MMT).

Our country is barely getting over the lead that Ethyl Corporation introduced into gasoline in 1925.

We cannot afford to introduce large amounts of another heavy metal into the atmosphere.

Manganese at high dose is known to have ill effects on the brain. Possible long-term effects on the environment are unknown.

Please deny Ethyl Corporations' application for "HiTec 3000".

Sincerely, David DeRousse

David DeRousse
1900 Oakdale Lane, N.
Clearwater, FL 34624

George F. Colangelo
Nancy Colangelo
6125 Westgate Dr. #1232
Orlando, FL 32811
October 28, 1990

William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

As citizens deeply concerned about the quality of the environment, we must strongly urge you to reject Ethyl Corporation's application to use methycyclopentadienyl manganese tricarbonyl (MML) as an additive to automotive gasoline. The hard-won removal of most lead from gasoline was one of the EPA's most significant public health achievements. Please don't set environmental progress back by approving the use of a toxic metal where it will undoubtedly be released into the atmosphere. Our children deserve a world free from toxic wastes and pollution. Perhaps you could encourage the oil companies to explore alternate energy sources instead of devising ways to make their current products more destructive.

Thank you for your consideration. We're sure you will continue to earn the public trust by protecting our future.

Sincerely,

George F. Colangelo

George F. Colangelo

Nancy Colangelo

Nancy Colangelo

October 23, 1990

William K. Reilly, Administrator
United States Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Reilly,

As a concerned citizen and an individual who supports cleaning up the environment, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive.

Sincerely,

Richard E. Mai

10/27/90

Mr. Reilly:

Please reject Ethyl Corporation's application to use MMT in gasoline.

Paul Kleinman, M.D.
84 Old Post Rd. South
Croton, N.Y. 10520

October 25, 1990

Mr. William K. Reilly
EPA
401 M Street S.W.
Washington, D.C. 20460

Dear Mr. Reilly:

I have read extensively about a fuel additive product known as HiTec 3000 which can significantly reduce harmful automobile emissions.

It is my hope that this additive can be approved for use in US cars within the next six months. I, for one, would be very interested in using it since I have older cars which do not have all of the more modern emission control systems installed.

Sincerely,

Vikki V. Huff
55 Pine Ridge Road
Wilton, CT 06897

Barbara G. McMahan
1132 Ridgetop Dr.
Chattanooga, Tn 37421

William K. Reilly, Administrator
Environmental Protection Agency
Washington, DC 20460

October 29. 1990

Dear Mr. Reilly,

I am concerned about the Ethyl Corporation's proposal to add methycyctopentadeinyl manganese tricarbonyl (MMT) to gasoline.

In Ethyl's application no data are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and exposures to humans.

This past summer as a parent of a student, I heard a Dartmouth geology professor address the economic aspects of environmentalism. Commenting on species preservation, he remarked that possibly only the fittest would or should survive, i.e. crows better adapted than spotted owls. I don't want to live in a world only populated by resourceful crows! But this same man voiced alarm at man's loosening into the environment, large quantites of substances--metals particularly, in much larger proportions than occur naturally. Ethyl's MMT seems to be such a case.

And Ethyl is the company which successfully introduced lead gasoline in 1925. We're still suffering from that poisoning.

I urge you to reject Ethyl's application to use MMT.

Sincerely,

Barbara G. McMahan

(Mrs.) Barbara G. mcMahan

946 Rhode Island St
San Francisco, CA 94107
October 29, 1990

Dear Mr. Reilly,

I am writing to you to express my concern about Ethyl Corporation's gasoline additive Hi Tec 3000 and to urge you to withhold EPA approval of it.

Our experience with Ethyl Corporations lead-based additives has amply demonstrated how dangerous they can be. Little is known about the long-term effects of manganese, Hi Tec 3000's heavy metal ingredient, on the environment and on human beings. Until these effects are understood, we should not take chances with this product and we should not risk our well-being.

Yours truly,
Charles Hall

Rainbow Leung
1540 5th Avenue
Oakland, CA 94606

October 21, 1990

William K. Reilly
Environmental Protection Agency
401 M Street
Washington, DC 20460

Dear Mr. Reilly,

Environmental Defense Fund has advised me that Ethyl Corporation is applying for a permit for their "HiTec 3000". This gasoline additive contains manganese which is known to produce symptoms of Parkinson's disease at high doses. Its effects on human health are still unknown. Thus, I am urging you not to approve this product until more information become available.

Thank you for your time.

Sincerely yours,

Rainbow Leung

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90NOV 2 A10: 16

Michael Scott
779 Fourth Ave
S Francisco CA 94118

OCTOBER 27, 1990

WILLIAM K REILLY
ADMINISTRATOR
ENVIORNMENTAL PROTECTION AGENCY
401 M STREET, SW
WASHINGTON, DC
20460

DEAR ADMINISTRATOR REILLY,

THE APPROVAL OF THE APPLICATION FOR THE ADDITION OF "HI TEC 3000" WILL MEAN A POISONED ENVIORNMENT IN THE FUTURE. PLEASE LISTEN TO THE PLEA OF A CONCERNED CITIZEN AND DENY ETHYL CO. APPLICATION.

TRULY YOURS

MS

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90NOV 2 A10:16

David Lodge
122 N. Orlando
Los Angeles, CA 90048

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

David Lodge

David Lodge

David B. Whitcomb
6320 Jerseydale Rd.
Mariposa, CA 95338

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

David B. Whitcomb

David B. Whitcomb

James B. Thompson
9036 A Kreuger St.
Culver City, CA 90230

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

James B. Thompson

James B. Thompson

Cathy Zheutlin
1524 Yale St. #4
Santa Monica, CA 90404

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Cathy Zheutlin

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90NOV 2 A10:22

WILLIAM K. REILLY
U.S. ENVIRONMENTAL PROTECTION AGENCY
401 M. STREET SW
WASHINGTON, DC 20460

DEAR ADMINISTRATOR REILLY,

AS AN ENVIRONMENTALIST I STRONGLY URGE YOU TO DENY ETHYL CORPORATION'S APPLICATION FOR "HiTec 3000", a TOXIC MANGANESE-BASED GASOLINE ADDITIVE. WE ARE STILL SUFFERING FROM THE AFFECTS OF CHRONIC LEAD POISONING. PLEASE DO NOT MAKE THE SAME MISTAKE WITH MANGANESE.

SINCERELY,

Donald L. Parker Jr.

DONALD L. PARKER, JR.
1813 ALDERWOOD PL.
THOUSAND OAKS, CA 91362

2837 S.E. Steele Street - Apt. 1
Portland OR 97202

October 25, 1990

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: Ethyl Corporation of America
request for approval of gasoline additive
methycyclopentadienyl manganese tricarbonyl

Dear Administrator Reilly:

I urge you to reject Ethyl Corporation of America's request for approval to use methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

The manganese in this product poses a potential threat to public health not unlike that caused by the use of lead in gasoline. Although we do not have data on the long-term effects of chronic exposure to lower doses of manganese, we do know that at high levels, it is a neurotoxin with irreversible pathological effects on the human brain. We also know the devastating cumulative effects of exposure to other heavy metals, such as lead and mercury.

For this reason, I believe that the EPA should reject Ethyl Corporation's request to market this manganese-based gasoline additive.

Sincerely yours,

Theressa J. Silver

Theressa J. Silver

4055 Lakeshore Avenue
Oakland, California 94610
October 27, 1990

William H. Reilly,
Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly:

We strongly urge the Environmental Protection Agency to reject Ethyl Corporation's application for approval of its "HiTec 3000" manganese-based gasoline additive.

Since research has found high levels of the heavy metal manganese to be toxic, there is no justification for taking the risk of adding another such pollutant to our environment.

The well-being of all of us is dependent upon your vigilance in protecting the air we breathe.

Sincerely,

Gail Weininger

Gail Weininger (Mrs. A.)

Art Weininger

Art Weininger

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90NOV 2 A10:25

Mr. & Mrs. Jeffrey J. Olson

5512 La Plata Circle
Boulder, Colorado 80301

October 27, 1990

William Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Reilly,

We are writing to urge you to reject the application by the Ethyl Corporation of America to approve a gasoline additive called "HiTec 3000." We have read that this additive contains the toxic heavy metal manganese, and we do not believe that our nation's population should be subjected to another potentially dangerous contaminant. We haven't even solved our problems with lead yet; to add another heavy metal with probable but not-yet-known health risks is sheer folly and unnecessary.

Please don't allow this corporation to experiment with the public health again.,and do not approve the use of HiTec 3000.

Sincerely,

Jeffrey J. Olson

Patricia A. Olson

Patricia A. Olson

183 Gifford Way
Sacramento, CA 95864
October 28, 1990

William K. Reilly, Administrator
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Reilly:

I am writing to strongly urge you to deny the Ethyl Corporation's application for their gasoline additive "HiTec 3000".

It is hard to believe, in this day and age with all the environmental problems we already have, that anyone would even consider using a product that would release manganese into the environment. We surely don't know, at this time, what the chronic, long-term effects of manganese would be, at low levels. But we do know that at high levels it causes irreversible brain damage. Is this something we want to take chances with?

The American people have shown that they want to clean up the environment, not add new problems to those we already have.

Sincerely yours,

Helen N. Hanna

VIRGIL P. CLINE
ATTORNEY AND COUNSELOR AT LAW

TELEPHONE
(303) 388-1795

130 SOUTH CLERMONT STREET
DENVER, COLORADO 80222

October 29, 1990

Mr. William K. Reilly, Administrator
United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Ethyl HiTec 3000, Docket A-90-16

Dear Mr. Reilly:

Bettie Willard, our highly respected environmentalist at Boulder, urges me to send this message directly to you.

Ethyl Corporation now has before you its application for approval of its automotive fuel, HiTec 3000. The purpose is to push across the issue that automotive fuel containing MMT at 1/32 gr. of manganese will not "cause or contribute" to the failure of emissions control systems to meet applicable standards.

After review of the Ethyl Application and the supporting materials it is my conclusion that the E.P.A.'s decision of September 11, 1978 is controlling and that Ethyl's Application should be denied. Ford and Chrysler are apparently in accord.

This Application is basically the same as Ethyl's application dated March 17, 1978. In the E.P.A. Decision dated September 11, 1978, the then Administrator, Douglas M. Castle, stated in denying the Application:

> "Although not required to do so by the Act, I find, based on our technical and statistical analysis, that MMT has an adverse HC emissions effect at 1/16 and 1/32 grams manganese per gallon concentrations. This effect was found, with high confidence, for all vehicle groups in EPA's data base."

I do not believe that time and technology have significantly changed emissions from gasoline engines running on fuel containing 1/32 grams of manganese. Accordingly, there appears to be no basis for the EPA to reverse its well-founded decision of September 11, 1978.

I hope you will find this reference to EPA's past experience useful in reaching your decision on Ethyl's current Application.

Sincerely yours,

Pete Cline

cc: Bettie Willard

4605 Mockingbird Lane
Bay City, TX 77414
28 October 1990

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, Southwest
Washington, D. C. 20460

Dear Mr. Reilly:

One of the EPA's most significant public health achievements is the removal of most lead from gasoline.

In view of what we have learned--the hard way!--about the use of lead in gasoline, and its toxic effects on our health, I find it incredible and appalling that the EPA would even think of approving the use of MMT as an octane enhancer in gasoline.

The Ethyl Corporation, in making such a proposal, has not made an in-depth review of the health effects of manganese, nor have they filled in vital gaps in the data re: manganese toxicity.

In light of what we do know and what we do not know about manganese's toxic effects, I beg of you, Mr. Reilly, to reject Ethyl's application. Show us that you really do protect us from the use of toxic substances such as manganese. Don't repeat the public health catastrophe brought about by the use of leaded gasoline. Instead, I urge you to give a resounding "No!" to Ethyl's application, and immediately suspend all manganese permits already granted.

Thank you, Mr. Reilly.

Sincerely yours,

Beverly McLaughlin

(MRS.) BEVERLY McLAUGHLIN

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EPA
CORR. CONTROL

90NOV 2 A10: 31

THAYER WALKER PRODUCTIONS

10.29.90

Wm. K. Reilly, ADM.
ENVIRONMENTAL PROTECTION
AGENCY
401 M St, SW
WASH. D.C. 20460

DEAR MR. REILLY,

I STRONGLY OPPOSE THE ETHYL CORPORATION APPLICATION TO ADD MANGANESE TO GASOLINE. MANGANESE IS A TOXIC KILLER. IT DESTROYS THE BRAIN AND NERVOUS SYSTEM. NO ONE HAS ANY IDEA WHAT THE LONG-TERM EFFECT OF MANGANESE IN THE ENVIRONMENT WILL BE, BUT CHANCES ARE, IT WON'T BE GOOD FOR YOU, ME, OR OUR CHILDREN.

I URGE YOU TO DENY ETHYL'S APPLICATION.

REGARDS,

THAYER WALKER

2819 HARRISON ST.
SAN FRANCISCO, CA 94110
PHONE 415/824-6441

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew *(Taxus brevifolia)* as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

T. Charles Erickson

Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"
—*The Wall Street Journal*

"...may break ground in the fight to protect the environment."
—*The Boston Globe*

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."
The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."
—*Star Tribune*, Minneapolis-St. Paul

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Watch for *"EARTH TO KIDS: A Guide to Products for a Healthy Planet,"* this December on HBO. Produced by Consumer Reports Television in association with EDF.

PEEL OFF FOR ORDER FORM INSIDE
02389722 AWL006
MR DAVID FALLOW
2722 CENTER AVENUE
MADISON WI 53704

EDF Letter

Mr. Reilly: Just Say NO! to Ethyl Corporation !!

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won *removal* of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

ELLEN K. SILBERGELD

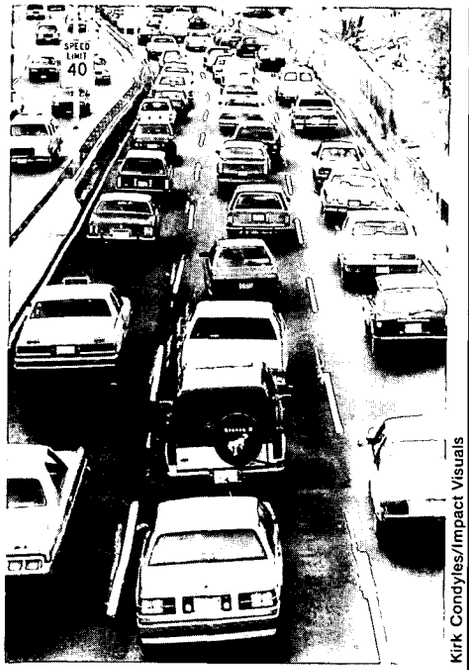
Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experiment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

↑ I already did.

Mitch Lamm
Cathie Lamm
2901 4th St. #104
Santa Monica, CA 90405

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Mitch Lamm

Cathie Lamm

Cathie Lamm

5550 Canfield Place.
Seattle, Wa. 98103

October 27, 1990

William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly:

Thanks to EDF I feel I understand the severity of the impact Ethyl's MMT proposal.

I urge you to reject their attempt.

We need to go forward ecologically rather than backward.

Sincerely,

Edward S. Esbeck, Ph.D.

RECEIVED
EPA
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Oct. 28, 1990

William K Reilly, Administrator
Environmental Protection Agency
401 M Street, SW,
Washington, DC 20460

Dear Mr. Reilly,

I want to register my disapproval of the new "Hi Tec 3000" additive which is being proposed for EPA approval. Such an additive to gasoline would endanger the public because of the manganese content, since manganese is known to be a toxic heavy metal. We have just diminished lead as a poison, let's not substitute manganese.

Sincerely,
Virginia W. Faxon
Virginia W. Faxon
830 Race
Denver, CO 80206

528 CALIFORNIA TERRACE
PASADENA CA 91105
29 OCTOBER 1990

WILLIAM K. REILLY, ADMINISTRATOR
ENVIRONMENTAL PROTECTION AGENCY
401 M STREET SW
WASHINGTON DC 20460

RE: "HiTec 3000" (ETHYL CORPORATION)

DEAR MR. REILLY:

THIS IS TO URGE YOU TO DISAPPROVE USE OF "HiTec 3000" IN GASOLINE. THIS ADDITIVE CONTAINS MANGANESE, A HEAVY METAL THE LONG-TERM EFFECTS OF WHICH ARE UNKNOWN.

THE ETHYL CORPORATION CONTINUED PRODUCING ITS LEAD ADDITIVE LONG AFTER IT WAS AWARE OF HEALTH PROBLEMS ASSOCIATED WITH ITS USE. ITS ATTEMPT TO EXPERIMENT ON ALL OF US WITH A NEW HEAVY METAL ADDITIVE OUGHT TO BE SQUELCHED.

LET US NOT ADD ANOTHER CHAPTER TO THE "WE LEARN FROM HISTORY THAT WE DO NOT LEARN FROM HISTORY" SAGA.

YOURS TRULY,

JAnScott

JANET A. SCOTT

17 Ben Herder Drive
Somerset, NJ 08875
30 October 1990

Mr. William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

The most recent Environmental Defense Fund "Letter" says that Ethyl Corporation has applied for permission to add manganese to gasoline to reduce emission of hydrocarbons and nitrous oxides from cars.

Remembering the introduction of lead for the same purpose, with similar unjustified assurance of the harmlessness of the additive, one can only urge you to deny the application.

Ethyl Corporation should be told to go home and not reapply until they have good, documented data in proof of their contention of the harmlessness of manganese additive.

Sincerely,

Helen F. Buell

Mrs. Helen F. Buell

3812 Ashley Drive South
Mobile, AL 36608
October 19,1990

William K. Reilly, Administrator
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Reilly:

This is to urge you to deny Ethyl Corporation's application for authorization to manufacture or use "HiTec 3000," a toxic manganese-based gasoline additive.

My request is prompted by my concern over the possibly high potential for harm to the people of our nation as warned by the Environmental Defense Fund, of which I am a member.

Sincerely,

Richard H. Kanning

Richard H. Kanning

A-90-16
IV-D-[redacted]

4416 Skymist Terrace
Olney, MD 20832

September 5, 1990

William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Administrator Reilly:

I write to you concerning Ethyl Corporation's request for approval to market **HiTEC 3000**, a performance fuel additive which has the potential to reduce harmful automobile emissions, for use within the United States. From the information Ethyl Corporation has provided, it appears the additive would be of tremendous boon to many of the Nation's most smog-plagued areas while simultaneously extending vital petroleum supplies, at a rate comparable to U.S. purchases for the Strategic Petroleum Reserve and at very reasonable cost.

No doubt some skepticism may exist with such a tremendous windfall! Seeing Ethyl's advertisement in Business Week, I was skeptical and had several questions. Of concern was how this additive would compare with our experiences with lead-based additives of decades ago and of the health effects of the many aromatic and other octane enhancing additives used today. Evidence I have received indicates this manganese-based additive should not replicate an increase in health risks as we experienced with lead-based additives of decades ago, and should help reduce the need for other pollutant contributing additives now in use. With the way many motorists feel about regular versus super unleaded gasolines and "performance," the continued over consumption of premium fuels with there attendant health and pollution problems is likely to continue. Consideration should be given to allow HiTEC 3000 be used to the fullest extent practicable to reduce the use and harmful effects of current performance additives.

Our goal should be to create more efficient utilization of our resources, which will result in fewer harmful pollutants entering our environment. HiTEC 3000 appears to be a rational, cost effective, and environmentally beneficial means for achieving this goal. I don't believe it alone is the solution, but by taking one step at a time we will be able to continue to build upon improvements. No doubt we will never reach a 100-percent efficient method for converting fuels into energy, but methods and techniques which improve this conversion should be encouraged and fully supported where it is apparent a net-positive impact (over the status-quo) on resources, our livelihood, and the environment can be realized.

I hope the EPA can support this small step towards improvement. EPA's role in moving the country ahead couldn't come at a better opportunity with the world once again struggling with the implications of turmoil in the Middle East.

Although urgency may advocate approval, it should not be with reckless abandon. The facts of the matter should be thoroughly reviewed. The extensive history of this additive indicates it will be beneficial and should be approved. I encourage you to expedite your review process and issue your decision as soon as possible. Let's move the United States back on track to a more favorable energy supply-demand posture while simultaneously improving our environment.

Sincerely,

David G. Bivans

October 24, 1990
78 Ridge Ave.
Newton, MA 02159

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Reilly:

In the interests of public health and environmental protection, I request that the Environmental Protection Agency deny permission for the Ethyl Corporation of America to produce a gasoline additive it calls "Hi Tec 3000." We are having to deal with lead contamination in the environment already and cannot allow the release of manganese into the environment that this substance would cause.

Sincerely,
Camilla G Spence

November 8, 1990

William K. Reilly
EPA Administrator
Washington, D.C 20460

Dear Sir:

As an active member of the Environmental Defense Fund, I must strongly urge you to reject the Ethyl Corporation's application to use MMT. In a well funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purporated reductions, if any, are very small and are overwhelmed by the health costs of the exposure to manganese.

Please refuse this application.

Sincerely,

Mark J McMillan Jr
POB 5575
Norman OK 73070

6 Buffalo St.
Nunda, NY 14517
Nov. 9, 1990

William K. Reilly, Administrator
Environmental Protection Agency
Washington, D. C. 20460

Dear Administrator Reilly:

As a parent concerned about the health of the nation's children and as responsible occupant of my environment, I am writing to express my deep concern regarding Ethyl Corporation's intention to market "HiTec 3000", a toxic manganese-based gasoline additive.

I urge you to deny their petition for EPA approval. The best way to prevent degradation of the environment is not to introduce contaminants in the first place. Thank you for your concern.

Sincerely,

Maryann Roby

Maryann Roby

11/5/90

Dear Mr. Reilly,

Please do not repeat the same disaster of 1925. Please do not support Ethyl Corporation's application to use MMT as a gasoline additive. It is incomprehensible to me how we can't learn from a past mistake of adding lead to gasoline. Lead poisoning has caused serious and continuing health problems in the United States. The data on manganese are relatively sparse compared to lead - we have not ~~yet~~ yet conducted a massive human experiment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment MUST persuade EPA to reject this application. We can't afford to repeat the public health catastrophe associated with the use of lead gasoline.

Thank you in advance for your consideration.

Have a happy & healthy holiday season

Sincerely,

Stella Golden
1052 Colony Dr.
Crystal Lake, IL
60014

To:
EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly:

I urge you to reject the Ethyl Corporation's application to use a manganese-containing gasoline additive, MMT.

The Ethyl Corporation has done no more to study the long-term effects of MMT than it did with tetraethyl lead additive in 1925, and it offers the same justification for using it that it did for lead: that it supposedly may reduce hydrocarbon and nitrous oxides from car emissions. What is known about manganese is that in higher, short-term doses it causes irreversible, serious damage to the human brain.

The experiment with lead additive proved to be a terrible mistake that we are still paying for. In another fifty years -- or maybe far less -- we could face the same problems with manganese that we are with lead, or even worse ones. Please don't make the same mistake that was made in 1925. Refuse the Ethyl Corporation's application for approval for MMT.

Robin Weare
5654 Sidney Ave.
Long Beach, CA 90805

374 N. 1500 W
Cedar City, UT 84720
Nov. 10, 1990

Mr. Wm. K. Reilly
EPA Administration
Washington, DC 20460

Dear Mr. Reilly, re: Reject MMT

More cars on the road.

More gasoline being burned.

Manganese--like lead--will accumulate in the environment with potentially hazardous result, especially in the cities where most children live and play.

We don't need MMT until its effects have been tested for the long term and proven safe.

Let's not have another tragic experience like leaded gas!

We urge immediate suspension of all current use of manganese additives in gasoline.

For safer air,
Howard I. Jump
Audrey G. Jump
Howard I. Jump
Audrey G. Jump

The Permanente Medical Group, Inc.

2025 MORSE AVENUE
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(916) 973-5000

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S. SACRAMENTO
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WALNUT CREEK

CLIFFORD W. SKINNER, JR., M.D.
Physician-in-Chief

NIHAL FERNANDO, M.D.
Assistant Physician-in-Chief

HARVEY L. KROESE, M.D.
Assistant Physician-in-Chief

JACK ROZANCE, M.D.
Assistant Physician-in-Chief

JERRY NEWMAN
Administrator

November 1, 1990

EPA Administrator
William K. Reilly
Washington D.C. 20460

Dear Mr. Reilly:

I strongly urge you to reject Ethyl's application to use MMT. Until we can prove that MMT, in particularly manganese is harmless, I don't think we should take a chance of contaminating the environment with it. There are many high octane gasolines without lead that have not had to use manganese as an additive. Let us not repeat our errors with lead with this other substance of which we are not sure.

Sincerely,

Gregory M. Leo, M.D.

KAISER PERMANENTE

Waltressa Molsberry
2956 Otterson Ct.
Palo Alto, CA 94303

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Waltressa Molsberry

Waltressa Molsberry

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Dawn Gilbert

Address: 4160 N. Park Ext.
Cortland Ohio 44410

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely, a concerned voter,

Name: Robert C. Bar

Address: 168 Kenmore N.E.
WARREN, Ohio
44483

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name:
Rebekah S. Prettyman

Address:
1683 Peck Leach Rd. N.
N. Bloomfield, Ohio
44450

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: Syed Mohmmed Ashraf

Address: 2460 KENILWORTH
CLEVE. HTS, OHIO 44106.