

Testimony of Becky Gillette
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“Toxic Trailers: Have the Centers for Disease Control Failed to Protect the
Public Health?”

U.S. House Science & Technology Committee
Investigations and Oversight Subcommittee

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My name is Becky Gillette, formaldehyde campaign director for Sierra Club. After Katrina, it soon became common knowledge that the FEMA trailers being used to house people who had lost their homes had serious air quality problems. People reported that being in the trailers caused burning eyes, respiratory problems, coughing, headaches, rashes and even bloody noses. Many people had what came to be known as “trailer cough”, a cough that wouldn’t go away.

After Paul and Melody Stewart of Bay St. Louis, MS, found high levels of formaldehyde in their FEMA trailer in early March 2006, Sierra Club funded work to test FEMA trailers to see how widespread the problem was. We began those tests in April of 2006 and continued testing later that year and again in 2007 because FEMA kept saying that all people had to do was ventilate the trailers and the problem would go away.

What we found was very alarming. Overall, 61 out of 69 tests—or 88 percent—were over 0.1 ppm¹. OSHA, EPA and other agencies all agree that health effects from exposure to formaldehyde may begin at 0.1 ppm². When you use the lower limits recommended by the Agency for Toxic Substances & Disease Registry (ATSDR) for long-term exposure, not a single one of the trailers tested in the safe range. The ATSDR Minimal Risk Levels is 0.04 ppm for 1-14 days exposure, 0.03 ppm for 14-364 days exposure and 0.008 ppm for 365 or more days exposure.

When we initiated testing, we suspected just a couple trailer brands had the problem. But out of 17 brands of trailers tested, all had at least one high test. And it was also alarming to us that there were three deaths of people in the trailers that we tested that we believe could have been caused by the formaldehyde. That is just the deaths we know of because it wasn’t possible to keep up with all 69 families tested because FEMA trailer residents are very migratory.

Sierra Club did everything possible to publicize the high formaldehyde levels in the trailers that were being used at one point to house more than 100,000 families. There were numerous articles and television news programs on the issue, but FEMA continued to deny there was a problem and said people just needed to open their windows and let the campers’ air out. At the same time people were moving out of their FEMA trailers to live in tents, storage sheds and even their vehicles because the formaldehyde was so bad.

¹ Sierra Club Fact Sheet “Toxic Trailers? Tests reveal high formaldehyde levels in FEMA trailers”.

²National Cancer Institute Fact Sheet “Formaldehyde and Cancer: Questions and Answers,
<http://www.cancer.gov/cancertopics/factsheet/Risk/formaldehyde>

People were experiencing numerous health problems such as repeated respiratory infections, migraine headaches and cancer.

Finally in September to October 7, 2006—more than a year after Katrina—EPA undertook testing of the trailers for FEMA. We were very glad that more expensive, extensive testing was being done to evaluate the problem since FEMA had discounted the Sierra Club testing. But we were extremely disappointed when there was delay after delay in releasing the results of the EPA testing. When we asked why, FEMA said the results were sent to the Agency for Toxic Substances and Disease Registry (ATSDR) for evaluation. I knew the test results had to be bad or FEMA would have announced them immediately. Four months after EPA did that testing, I sent a Freedom of Information Act request to get the EPA testing results, and started sending e-mails to a contact at ATSDR³.

In an email to James Durant, an environmental health scientist for the ATSDR, Feb. 27, 2007, I wrote: “We have been very frustrated with the widespread poisoning of tens of thousands of people in FEMA trailers due to high levels of formaldehyde. FEMA and the (Mississippi) Health Dept. refuse to do anything about it. Would this be something we could request investigated by ATSDR? Any tips for us on how to do that?”

Mr. Durant responded: “I am sorry that it has taken a while to get back to you. My supervisor and I have been trying to track down who in CDC/ATSDR has been heading up this issue. This was not as straight forward as we thought it would be. We have found the person heading this up, but she is out of the office. Hopefully, we will be able to get an answer to you on what is going on with the formaldehyde soon.”

I never heard anything back, and on May 7—seven months after the EPA testing was concluded—I once again wrote Mr. Durant and asked: “Did you ever find out who is handling the FEMA request for information from ATSDR regarding formaldehyde in FEMA trailers? FEMA just put out a release showing their testing showed very high levels of formaldehyde even after ventilation. But FEMA says that is below the ATSDR threshold, which is several times higher than the EPA and American Lung (Association) guidelines.

“I just tested a family with .32 ppm...they have spent over \$700 on medical bills related to the toxic exposure. It is very wrong to suggest these levels—so strong they make your eyes burn—are acceptable.

“Do you have a contact at ATSDR on this?”

Mr. Durant responded: “So you are telling me that no one has contacted you regarding formaldehyde at all? When you contacted me, we attempted to have the person who is heading this up contact you. It was my understanding that you would be contacted. I will flag this issue and try to get someone to contact you that knows what is happening.”

“My response was: “No, I never heard from anyone. ATSDR, we have been told, has been asked to give recommendations to FEMA. Ventilation simply doesn’t work here in the summer as it is too hot and humid. If you do ventilate, the humidity can actually make outgassing worse.”

³ ATSDR emails between Becky Gillette and James Durant, February-May 2007.

In early 2007 when I first contacted the ATSDR, the agency had already produced a Health Consultation. It was dated Feb. 1, 2007. But that information was not released to the public until months later and then the report went counter to the agency's own formaldehyde standards.

When it was finally released, the ATSDR's Health Consultation was a huge disappointment. I'm quoting excerpts from a FEMA press release May 4, 2007 titled FEMA Study: Ventilating Travel Trailers Can Significantly Reduce Formaldehyde Emission Levels⁴:

"FEMA said today that its study of air samples collected from travel trailers in the Gulf shows that formaldehyde emission levels in the units can be significantly reduced through adequate ventilation. The study involved collecting air samples from 96 new, unused travel trailers from Sept. 19 to Oct. 7, 2006, at a staging area in Baton Rouge, La.

"The baseline for concentrations of formaldehyde in the units averaged 1.2 ppm (parts per million) at the beginning of the test. ...According to the evaluation report provided to FEMA by ATSDR, the average concentration of formaldehyde per day in the units using open window ventilation dropped below 0.3 ppm after four days of ventilation and remained low for the rest of the test period. The level for health concerns for sensitive individuals was referenced by ATSDR at 0.3 ppm and above."

This is shocking because 1.2 ppm is extremely high. I found it incredible that ATSDR could say that 0.3 ppm was below the level of health concerns. At that level, most people experience extreme distress. It was far, far too high. ATSDR's own standards are many magnitudes lower at 0.04 ppm for 1-14 days exposure and far lower than that for long-term exposure.

In a nutshell, the formaldehyde levels with ventilation went from astronomical to extremely toxic and the ATSDR told the public: No problem! ATSDR gave completely erroneous advice. What ATSDR did was criminal negligence covering up this problem when the health and lives of tens of thousands of Americans were at stake.

Finally in October of 2007 the ATSDR revised the February Health Consultation to more accurately reflect the scope of the problem. But that means it was one year between the time ATSDR was asked to evaluate the EPA test results and when the agency delivered the second Health Consultation that more accurately described the risks. That was one year of time where tens of thousands of families were exposed to this toxic gas. It was one entire year when women were getting pregnant and sometimes having miscarriages, stillbirths or losing their children to Sudden Infant Death Syndrome (SIDS). Children and adults were getting cancer. And people with pre-existing conditions like asthma were finding it literally hard to catch a breath. Mothers were getting up in the middle of the night to give breathing treatments to children.

⁴ <http://www.fema.gov/news/newsrelease.fema?id=36010>

I had no sense that there was any bureaucrat in Atlanta or Washington who even had a clue the amount of suffering and illness that was resulting from this long-term exposure to a toxic gas. I recall calling to give the bad news to Earl Shorty in Baker, La. about their trailer's high formaldehyde levels. His wife Desiree Collins was coughing so bad in the background it was painful to hear her. A short time later she passed away.

One woman I tested, Theresa Coggins, a diabetic, had gone into a coma for eight days, running up a \$100,000 hospital bill. Another woman whose trailer tested high, Christine Lawrence, told me her head felt like a balloon that was about to bust.

FEMA and ATSDR showed an appalling lack of urgency. There was a callous disregard for the health of FEMA trailer residents. I didn't get the sense there was anyone in FEMA or ATSDR waking up in the middle of the night worrying about families being poisoned. Instead, all we got was a cover-up and denial of the problem.

If it was possible to file a malpractice lawsuit against a federal agency, the ATSDR would not only end up owing millions of dollars for harming the health of people, but it would lose its license to practice medicine.

Other concerns about ATSDR

But the thousands of people who have suffered from this agency's negligence on formaldehyde are only the tip of the iceberg. For many years now the ATSDR has been called in when communities are concerned about health impacts from massive amounts of toxic pollution. Contaminated communities often feel let down by how little ATSDR studies can tell them about associations between millions of pounds of toxic releases and rampant illness and early death nearby. And they are frustrated by the long amount of time it takes for ATSDR to complete studies.

I would like to introduce into the record a report that details the injustices of ATSDR in Mossville, LA⁵. One of the authors of that report, attorney Monique Harden, wrote the following:

“Any help that you can provide in getting the Science & Technology Committee to connect the dots between ATSDR's role in the toxic FEMA trailers with its "public health" work in communities plagued by pollution would be greatly appreciated. The problem that we have is that ATSDR's conduct in the FEMA trailer crisis is not an aberration but is consistent with the way it has always worked.”

The ATSDR has also suppressed a report on Great Lakes health risks showing people living in polluted areas around the Great Lakes face higher rates of lung, breast and colon cancer.

Sal Mier, a concerned grandparent in Midlothian, Texas, who retired from the CDC as Director of the Division of Prevention in the Dallas Regional Office, says:

⁵ ATSDR's Misinformation Campaign on Dioxin Exposures in Mossville, Louisiana, August 2007.

“We strongly believe there is a national pattern in the manner in which ATSDR conducts their Consultations and Assessments and that this pattern could result in great risks to the public health of many U.S. communities. It is our perception that ATSDR embodies a philosophy and consequently a methodology and guidance that is designed toward the non-identification and/or trivialization of public health problems.”⁶

Mr. Mier says the most people who request Health Consultations end up wishing they hadn't. That is because ATSDR issues a report whitewashing any health impacts from the pollution, and it removes any leverage local communities had with the polluters. Mr. Mier says: “It puts last nail in the coffin because it exonerates the polluter. I think there is a pattern nationally.”

The Olympic Environment Council (OEC) is another environmental group that regretted ever petitioning for the help of ATSDR to assess the link between 67 years of releases of dioxin, PCBs, phthalates, heavy metals, and other contaminants released from a local chlorine dependent pulp mill in Port Angeles, Washington, and high incidences of illness in the community. In a letter to the ATSDR, Darlene Schanfald, Ph.D., OEC Project Coordinator, Rayonier Hazardous Waste Site Cleanup, said:

“There are so many flaws in this report that rather than enumerating/citing each, the report can be summed up as a corruption of science. Maybe even a corporate corruption of science since it is evident the staff did not want to rule against the polluter when there was substantial evidence to do so.”⁷

Numerous flaws in the ATSDR consultation were detailed in a report prepared by Dr. Peter deFur⁸.

Even when the agency does find a link between pollution and health problems, it tries to shield industry. At case in point was an ATSDR investigation of DuPont Delisle on the Mississippi Gulf Coast, one of the largest sources of dioxin emissions in the country. After Katrina ATSDR did find dioxin levels in crabs can make them unsafe for consumption by girls and women of childbearing age. But ATSDR denied there was any link between the dioxin found in the crabs and DuPont, which is the only large industry on the Bay of St. Louis.

⁶ Letter from Sal Mier to House Science and Technology Committee: ATSDR's Conduct with Public Health Consultations/Assessments, A Possible Systemic Nationwide Problem, Feb. 20, 2008.

⁷ Letter to Julie L. Gerberding, ATSDR Administrator, RE: FINAL PUBLIC HEALTH ASSESSMENT FOR RAYONIER, INC. MILL, PORT ANGELES WA – EPA FACILITY ID WAD000-490169, from Darlene Schanfald, Ph.D., OEC Project Coordinator, Rayonier Hazardous Waste Site Cleanup, Oct. 22, 2004.

⁸ Comments of Dr. Peter L. deFur on behalf of the Olympic Environmental Council (OEC) on the Public Health Assessment for Rayonier Mill; Port Angeles, Clallam County, Washington; CERCLIS No. WAD 000490169, September 6, 2000.

Conclusions and Recommendations

These cases are all clear evidence of a pattern of ATSDR betraying the public's trust when doing public Health Consultations. Our tax dollars are being used to lie about the impact of toxic pollution. The harmful and inaccurate advice regarding formaldehyde in FEMA trailers is just the latest egregious example. At the end of the press release for the first formaldehyde Health Consultation, it says: "ATSDR serves the public by using the best science, taking responsive public health actions, and providing trusted health information to prevent harmful exposures and diseases related to toxic substances." This mission statement is contradictory to the advice given in the first formaldehyde Health Consultation. **Congress could help address this problem by calling for an independent federal National Academy of Sciences investigation of the process by which Health Consultations are developed and communicated.**

Now that the scope of the formaldehyde problem is apparent, immediate steps need to be taken to provide health care to the many thousands of families who have been sickened. Many of these families lost everything in the storms, and don't have health insurance. The government needs to set up free health clinics and work diligently to help physicians and other health professionals determine the best methods to treat the wide variety of health problems that have resulted. The Children's Health Care Fund has studied the health of residents of the FEMA trailers and determined there is an urgent need for a health care "Marshall Plan" to respond to an emerging humanitarian crisis in Louisiana and Mississippi.⁹ Sierra Club endorses this recommendation.

The CDC has already announced a study monitoring the health of children who lived in the FEMA trailers that will eventually be expanded to a study of the health of adults. This is badly needed and these studies can't end in a few months because the health effects of this exposure can be expected for the lifetimes of those people exposed. The CDC also needs to study mental health as some professionals suspect the high rates of depression and suicide on the Gulf Coast could be linked to the toxic exposure¹⁰.

Katrina was the largest natural disaster in our nation's history, and the formaldehyde in FEMA trailers was the second disaster that harmed the health of people far more than the original disaster. I strongly urge you to realize that the storm is not over. Katrina merely was a "perfect storm" to expose the formaldehyde poisoning that has been allowed in our buildings now for decades.

ATSDR, FEMA and HUD are still not responding adequately to results that showed high levels of formaldehyde in RVs, trailers and other products that are sold to the general public. FEMA just purchased what was available for sale to the public. Manufacturers have said they didn't do anything different in manufacturing trailers for sale to FEMA than to the general public.

The fact is that formaldehyde has been a big problem for many, many years. The CDC needs to take immediate steps to do a nationwide survey of how big the problem is

⁹The Recovery Divide: Poverty and the Widening Gap among Mississippi Children and Families Affected by Hurricane Katrina, http://www.childrenshealthfund.org/whatwedo/operation-assist/pdfs/TheRecoveryDivide_Full%20Report.pdf, February 2007.

¹⁰ Statement from Ph.D. Psychologist Dr. Lou Finkle of Gulfport, MS, March 24, 2007.

not only in RVs and manufactured housing, but also in temporary classrooms that have tested high. We have even seen high formaldehyde levels in government office buildings such as one occupied by U.S. Rep. Diane Watson¹¹.

Many millions of Americans live in manufactured housing. A lot of people retire to live in a RV at least part of the year. With the declining economy, many people who are losing their homes are moving into trailers. At my blogsite www.toxictrailers.com many people have written about high formaldehyde levels in RVs, trailers, regular homes and offices. It isn't just victims of disaster who are at risk here. The CDC needs to immediately launch a nationwide investigation into formaldehyde levels in RVs, mobile homes, temporary classrooms and other housing that may be contaminated. If there is one benefit that can come from all the suffering resulting from formaldehyde in FEMA trailers, let it be that we finally get this toxic gas out of building materials providing the citizens of the U.S. the same protections provided under the law in Europe, Japan and even China.

¹¹ U.S. Rep. Diane Watson statement at formaldehyde hearing before U.S. House Committee on Government Oversight and Reform, July 19, 2007.