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SUBJECT: Review of GAO Report FPCD 80-23

TO: HQ USAF/SGES (Maj Brown)

1. We concur with the GAO recommendation that a governmental agency evaluate the feasibility and value of a new health effects study of Herbicide Orange on ground troops. Because of the extreme complexity of that feasibility effort, we recommend that an appropriate interagency task force assume that responsibility versus a single agency. We perceive no value in linking any proposed study of ground troops with the presently approved Air Force study of RANCH HAND personnel.

2. As presented, the GAO document does not permit an assessment of the validity of the methodology or its biological significance. The method identifies a potential exposed population, apparently to primarily counter the DOD position that ground troops were rarely exposed to Herbicide Orange. Verification of exposure would be complex if not impossible. Distance from the spray line and elapsed time after spraying as provided by their method ignores the environmental fate of herbicide and its associated dioxin. Their time-distance exposure concept, if adopted as a primary study methodology, would suffer significant errors of misclassification which could either dilute a true health affect or produce a biased attribution of cause and effect. There are better epidemiologic techniques than implied by GAO, as well as better ground troop populations to study.

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