

HISTORY OF THE
U. S. FOOD AND DRUG ADMINISTRATION

Interview between
LesseL L. Ramsey
Retired FDA Scientist
and
Fred L. Lofsvold
U. S. Food & Drug Administration
Washington, D. C.
February 1, 1982

INTRODUCTION

This is a transcription of a taped interview, one of a series conducted by Robert G. Porter and Fred L. Lofsvold, retired employees of the U. S. Food and Drug Administration. The interviews were held with retired F.D.A. employees whose recollections may serve to enrich the written record. It is hoped that these narratives of things past will serve as source material for present and future researchers; that the stories of important accomplishments, interesting events, and distinguished leaders will find a place in training and orientation of new employees, and may be useful to enhance the morale of the organization; and finally, that they will be of value to Dr. James Harvey Young in the writing of the history of the Food and Drug Administration.

The tapes and transcriptions will become a part of the collection of the National Library of Medicine and copies of the transcriptions will be placed in the Library of Emory University.



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TAPE INDEX SHEETCASSETTE NUMBER(S) 1 and 2GENERAL TOPIC OF INTERVIEW: History of the Food and Drug AdministrationDATE: Feb. 1, 1982 PLACE: Washington, D. C. LENGTH: 110 MinINTERVIEWEEINTERVIEWERNAME: LesseL L. RamseyNAME: Fred L. LofsvoldADDRESS: [REDACTED]ADDRESS: U. S. Food & Drug Admin.Denver, ColoradoFDA SERVICE DATES: FROM 1942 TO: 1973 RETIRED? YesTITLE: Deputy Director, Office of Compliance, Bureau of Foods
(If retired, title of last FDA position)

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This is a recording in the series of FDA Oral History interviews. We are interviewing today Mr. Lessel L. Ramsey, a retired scientist from the Food and Drug Administration, at the Cosmos Club, Washington, D.C. The date is February 1, 1982, interviewer is Fred Lofsvold.

Lofsvold: Mr. Ramsey would you please sketch out briefly your career with FDA, when you started and what kind of jobs you held during the time you were with the agency?

Ramsey: Yes. When World War II came along, I was in Washington working for the Railroad Retirement Board as a high-flown clerk, at least a clerk with a high-flown title. I had taught high school science, and recognizing that there wasn't much of a future in high school teaching in Wisconsin, I had taken one examination after another. There wasn't a federal examination for which I was qualified, or a state or a local examination that I didn't take.

I had always had a hankering to get back into chemistry. I had done some graduate work in chemistry. I had taken a course on the adulteration of foods at the University of Wisconsin, in a summer session when I was teaching high school chemistry, as well as, other courses

which would have led to a masters degree in chemistry, but I did not find time to follow that up. The point I wanted to make was, that I had always been interested in chemistry, although here I was in a clerical job, at a GS-6 level, which at that time was some \$2300 a year.

The war came along and the Roosevelt Administration was going to move the Railroad Retirement Board out of Washington, all of its offices to Chicago because they needed space for war offices. I had a horror of moving from Washington to Chicago because I always regarded Chicago as a city of slums and dirt and filth and I didn't see myself raising up my family in Chicago. So I began to look around, I had looked before, but now I really began to look for a job. There were jobs in the war agencies but since I had taken a course in adulteration of foods, I knew about the Food and Drug Administration (I had done a lot of reading, I knew about the A.O.A.C. Book of Methods; we had used it back there at the University) and decided that was the place I would apply.

I went over and was interviewed by Dr. Ward Benjamin White, by Lowry Beacham, by J. W. Sale who was the Head of the Beverage Section, by J. Kenneth Kirk who was in the Interstate Office, so called at that time. I was impressed with these people. They were people of understanding,

people who seemed to know what they were doing. The new agency from which I had come, on the other hand, since it had grown up in the Roosevelt years, was not quite that same sort of thing. It hadn't really shaken down yet. So I was impressed.

When Dr. White said that he had a position open that he was thinking about filling because a chemist had just left, I indicated some interest in it. So he came over to interview my supervisors at the Railroad Retirement Board, he and Lowry Beacham both. Then they went back and discussed it. Dr. White told me he also took it up with the Commissioner, because here I was at \$2300, and I was applying for a job as a junior chemist, which was a P-1 at \$2,000.00, and what could be done about that. J. Walter Sale pointed out, well I was a mature individual, let me see, at that time, it was 1942, I was some 33 years old. I was a mature individual. He would offer no objection if the administration would go along with starting me in the middle of a P grade. So I started in the middle of a P-1 grade.

My first supervisor was Robert Ambrose Osborn, he never liked his middle name Ambrose. A fine old career food and druggist who knew the philosophy of Food and Drug, he was a skilled analytical chemist; it was at his knee that I

learned a lot about analytical chemistry. Before I actually started laboratory work, the first two weeks I spent in Dr. White's office. He decided that I needed a two week period of indoctrination into the philosophy and policies of Food and Drug. So I spent two weeks there and I've always been grateful that he would take that time to do that because it did prove to be very helpful.

Anyway, I began a routine analysis of fruit juices for their potash, P₂O₅, yes, what else did we analyze for, sugar? Let me see, ash, potash and then, we didn't really do sugar, we took the reading on the saccharimeter to get the sugar content for purposes of building up authentic data. I spent about a year at that.

Then Wilbur I. Patterson was hired by Ben White to head up the Methods Branch. I was then transferred down to work with Patterson on the decomposition of food, to find some chemical indices for decomposition of food. Patterson was a well-grounded organic chemist as well as biochemist. He had done a post-doctoral tour under DuVigneau at George Washington University. DeVigneau later became a Nobel Prize winner. There wasn't any question that Dr. Patterson had a great influence on me. I was impressed with his credentials, and more than that, he really knew chemistry. He knew more about chemistry than I every thought existed.

I spent several happy years learning chemistry, learning analytical chemistry, learning composition of foods. Then of course, at the time I came in, we were still analyzing a lot of foods for pesticide residue and the problem of the Division of Foods was to check out the methods for these pesticide residues which were largely lead, arsenic, and fluoride.

In 1942, DDT was being used in the Army to combat lice and it was found also to be a good agricultural pesticide. With the advent of DDT, there was a burgeoning then of organic pesticides. I was involved in the work for methods on many of those, the separation of the isomers of benzene hexachloride, for example. One of them that really gave us some dark moments was sodium monofluoroacetate; the common name at the time was 1080. It was an extremely toxic substance, and the susceptibility of species varied very much. It was used at the time we began work on it as a rat poison, but dogs were much more sensitive. Whereas, the LD50 for rats was of the order of about 10 mg/kilogram of body weight, the order of toxicity for dogs was about a tenth of a mg/kilogram body weight. 50 to 100 times more toxic to dogs.

We needed a method because there had been some misuse of it. The stuff is very soluble in water and so it had

been used in souffle cups as a rodenticide in food warehouses and feed warehouses. They had taken these cups in some instances and put them on bags of flour or bags of feed, and the cups would get jarred and they would spill and so forth. So that was one of my first assignments, to develop a method for 1080. Incidentally, just a few years later an interesting thing happened about 1080.

One of our pharmacologists, Jack Frawley, was called to service when the Korean War broke out in the '50's. Being a pharmacologist, he was not sent into the battle line. He went over to Walter Reed Hospital to conduct toxicology feeding studies for the Army. One of the feeding studies that he was conducting involved dogs. He had a colony of around a 100 dogs over there. One morning he came to work and the dogs were all dead. A hell of a tragedy, he said since about a \$100,000 worth of research went down the drain when he came to work that morning. These dogs, he said, hauled out and piled up, looked like a mountain of dogs out there. He called me up on the phone. He said, "Les I think that it was 1080. I think the feeding attendants got the mineral-vitamin mixture confused with the rodenticide that we had here, which is 1080." They had it right there in that area. He said, "I need somebody to analyze it. We don't have anybody over here to analyze

1080. You were the one who developed the method that is in use now, and would you be willing to analyze it?" I told him that Food and Drug always cooperated in cases like this, and that I was sure that could be done. I was so tied up myself, but certainly I had somebody here, in fact it happened to be Owen Winkler. I said, "Owen Winkler will do the job and he will get it right for you." And sure enough we analyzed the dog tissue; we analyzed tissue from all organs of several dogs, and sure enough the stuff was distributed all over the animal bodies with the water of the body just as we knew it to be. The qualitative tests that I had developed indicated it was 1080 and quantitatively indicated it was in the order of a part all the way up to about 2 to 3 parts per million in some of that tissue.

A very interesting side light, I was also involved at that time, in the development of other methods, for example, for preservatives.

The only one that really might be worth mentioning at the moment is the preservative dimethyldichloro succinate. The industry had found that this chemical is a powerful antimycotic, useful in packaging such foods as cheese, breads, fresh raspberries and fresh tomatoes. They had told the Food and Drug Administration about it, at least

the Kraft Cheese Company had. They said they had found it very useful and they had done some toxicity studies. They had decided that it was safe to use for that purpose, and what did Food and Drug think of it. Well, the advice, of course that Food and Drug gave was the only advice it could give under the poison per se, provision of the old 1938 law, that any substance not required in the manufacture or the production of food, must be banned per se. You just can't tolerate it; Food and Drug cannot officially condone its use. They were told that and never-the-less they went ahead and used it, and they used it for some time.

So the Division of Food, Ben White said, "We've got to have a method, we've got to have it right now, get somebody to work on it." So I was the one that was assigned to the method with Patterson's help, of course. We went to work on it and developed a qualitative test which is specific for a chemical of that structure and developed a quantitative method as well. Well, when we got the recoveries to be satisfactory, I began looking at some Kraft cheese and sure enough I found that the chemical had migrated from the packaging material into the surface of the cheese. In fact, in some cases, had gone well into the cheese, it being a fat soluble compound. In fact, I also found it in some cream cheese. The amounts found would be of the order

of a few parts per million. They didn't say precisely how much there might be there, but the method would pick it up anyway down to the level that we were finding it. Well, in some cases, it was up to 20 parts per million, that was the biggest.

After I had analyzed a number of cheeses, the Food and Drug told the Kraft Cheese Company through one means or another; I don't know who conveyed the information. I suspect it was Kirk probably who wrote them, what we had found in their cheese and if they didn't stop it we were going to seize the cheese and so they came in to talk to us about it. They wanted to talk to Lehman because it was safe. It happened that Heiny Lepper and I sat in on the meeting with the vice president of the Kraft Cheese Company and Lehman at that time; it was not the big conglomerate that it is today although it was a large company. Lehman said, "Its too toxic to use. Its a poison, there's no question about it. It shouldn't be used." And then, "How much did you find?" And so I reported my findings and I said, "Also I found it in some cream cheese."

Lofsvold: " You found it in some cream cheese?"

Ramsay: "Yes, found it in some cream cheese." "Well, you couldn't have found it in any cream cheese because we don't use it in cream cheese." So here I was sitting at this big

table here (I was just a lowly junior chemist). Here was the Assistant Chief of the Division of Food, here was the Chief of the Division of Pharmacology and here was the vice president of the Kraft Cheese Company saying, my god, there's something wrong with that chemist of yours. He found some that we didn't put in there. All I could do was to say the method that I had used, and I had some confidence in it, shows that it was in that cream cheese.

So we came back, and time went on and pretty soon the General Counsel of the Kraft Cheese Company stopped in at Heiny Lepper's office one day, said he wanted to make an apology. He said the vice president of the Kraft Cheese Company was not fully informed when he was in Washington last time and he told a group that the Kraft Cheese Company had not used any dimethyldichloro succinate in their Philadelphia Cream Cheese. Actually, they had used it, the General Counsel said. That was one of the things that boosted my progress in the Food and Drug Administration. By god, I had been redeemed. Heiny Lepper being the kind of a man he was, saw to it right away that everybody was informed, including the Commissioner, that the Kraft Cheese Company didn't know what the hell it was doing and we had to tell them.

I think that takes care of that. Of course, I was supposed to have been a research chemist to some extent there in the Division of Food. I worked on a lot of things such as, the separation of fatty acids. Some of these things really didn't have too much practical value, although we thought at the time that being able to separate out propionic acid, and use that as an index of decomposition would be a great thing. The same way with butyric, isobutyric and some of these other acids. All of that in the long run, did not prove to be particularly useful.

Time marched on and the Congress had grown weary of Food and Drug's reluctance to set pesticide tolerances for those pesticides that were required in the production of agricultural commodities, that were required in the production of food, that could not really be avoided if you were going to have adequate food supply.

Now under the original 1906 Act, the Food and Drug Administration did not have the authority to set any tolerances, any formal tolerance. And so over the years, beginning certainly very early, and by the 20's the squeeze was really apparent. The informal tolerances were tightened on lead and arsenic, particularly after a boat load of apples poisoned some people in England, that had come from I believe, the State of Washington. Anyway, after

that little incident, Food and Drug cracked down and kept squeezing down the amounts of lead and arsenic that they would regard as being acceptable on apples shipped in interstate commerce.

In order to get under those tolerances, actually, some of the big orchards in the West set up great big acid washers in which they washed the apples with dilute acid in order to get the lead reduced to the action level. There are tales of some orchards actually being forced out of business. Tom Bellis is the one who has information on that kind of thing. He can cite the names of the people and the bushels of apples they were producing and that they had to go out of business because they couldn't meet the action level.

Actually, things really got so bad that the industry went to Congress and complained very bitterly about those low tolerances for arsenic and lead. Congress, lo and behold decided Food and Drug was being too zealous and they cut off their funds for research on arsenic, definitely on arsenic. Arsenic is the one I remember because old Dr. Nelson told me one time about this fine group of dogs he had going on a feeding experiment with arsenic. He said, "You know, you never saw dogs with a finer coat of hair than those dogs had. Arsenic has the property of enhancing

the complexion of people in small amounts, and of producing a very fine looking hair on animals as well as people."

Beginning in about 1932 we had set that informal tolerance and these tolerances were widely publicized and by god we enforced them. On fresh fruits for arsenic it was 1.4; for lead it was 3.5; and for fluoride it was 2.8. Well Congress, after hearing the industry's tales of foods being seized and destroyed and so forth, big shipments of apples, decided that we just weren't looking at all the facts. So they said that the Public Health Service was the one that ought to tell how much was safe. In 1940, the Public Health Service did make a study and they did say that that arsenic informal tolerance ought to be raised to 3 1/2 parts per million and by god that's what we did. We raised it and we raised the lead to 7 and about that same time they recommended that the informal tolerance for DDT, which was also being used, (this was in the early '40's there ...it really wasn't widely used until immediately after the war) that it ought to be set at 7 parts per million.

So time went on, but we still hadn't really taken the bull by the horns and set formal tolerances in accordance with the 1938 law. The war had made us short on personnel, a lot of the people were involved in doing work for the Army, the antibiotic program was a big cooperative program

that we had with the Army. It required a lot of our personnel in Washington and anyway, we simply didn't get around to hold a hearing.

Well, the hearings were finally held beginning about 1950. Testimony, running into dozens of volumes, was accumulated. Frank McFarland was given the job of going over the hearing record and making some sense out of it and coming up with some findings, with some conclusions as to what the formal tolerance ought to be for a long list of pesticides. He was involved in that of course; he was about the only one working on it. Well, he was working right under Charlie Crawford he says, and I guess Winton Rankin helped out some, I'm really not sure how much Winton was involved in that, but Charlie Crawford was closely involved.

Finally in 1955, of course with Goodrich's people involved in this too, they finally got out the proposal for tolerances and they finally firmed it up. So in 1955, we finally published the first tolerances, not the first tolerance, but the first complete set of tolerances that were established in accordance with the provisions of Section 406, I believe it is, of the Food and Drug and Cosmetic Act of 1938. Well, Congress had gotten tired, however, of all of this prolonged stuff on setting these tolerances.

They decided it was unwieldy and cumbersome and by God they were going to do it differently, and so they passed an amendment. A so-called Pesticide Chemicals Amendment in 1954, the Miller Amendment which made it very easy, procedurally and administratively, to establish a tolerance. You didn't have to go through a long hearing and all that sort of thing. You simply had to go on a petition submitted by the industry. Agriculture would tell Food and Drug whether the pesticide was useful, and Food and Drug would decide whether or not the residue remaining from this usefulness was safe. They would set the tolerance at the safe level, but they would not set it higher than was necessary to produce the crop, even though a higher tolerance would be safe. That was the beginning then of the long series of tolerances established under the Pesticide Chemicals Amendment.

Lofsvold: That provision, Les the amendment for pesticides...that gave us, then, the authority to demand information from the firms before they marketed the article rather than us having to establish a tolerance after the fact, as it had been under the original bill. Is that correct?

Ramsey: That is correct. That was a land mark decision, that the industry had to prove it was safe before it was used instead of us proving it was unsafe after it had been used.

The 1938 law of course, was a great improvement over the first law. In the first law, you not only had to prove that lead itself, was a poison, but you had to prove that the food with that little bit of lead on it, was injurious to health. Of course, the wording of the law was, we had to establish that the added poisonous or deleterious substance, the pesticide in other words, may render the article injurious. Well, then, the effect of that was that you had to prove that it would be injurious in those small amounts. Of course, that was a very heavy burden for the Food and Drug to assume but, never-the-less, in the case of lead and arsenic, we really used it and worked it to its limit. But under the 1938 law, it simply deals with the substance itself, the poison per se, provision, simply bans it unless it is required in the production, or cannot be avoided in good manufacturing practice. So that was a great advance forward, but now, the Miller Amendment even went further than that and made it very simple administratively to go ahead and establish tolerances which had been shown to be merely useful, and so the thing did go on for years.

It was about that time that I moved into Frank Vorhes' office. Frank Vorhes had succeeded Dr. White, who had died around 1950 or so. He had succeeded him and was concerned about the Division of Food's role in the evaluation of analytical methods and residue data for the petitions that were coming in and I was made his assistant to oversee that operation. That went on for a while and there was a tremendous problem under that Miller Amendment that nobody had really quite recognized.

There had been some chemicals used that there were not tolerances for and yet when the raw agricultural commodity was shipped, there would certainly be residues there and it was certainly poisonous. I'm referring now to the grain fumigants, ethylene dichloride, carbon tetrachloride, carbon bisulfide and ethylene dibromide. Anyway, these grain fumigants had been used all those years and Food and Drug hadn't worried too much about those. They knew that there were residues on them, or suspected there were when the grain was shipped in interstate commerce; in fact, sometimes the box cars would be fumigated. So there wasn't any question of whether it had a poison on it, but the assumption had always been, that in the food as man ate it, there would not be any harmful residue. But there were no data and so the Division of Food was called upon to look into

the problem and Vorhes took the bit in his teeth and said, "Well, we'll do something, we'll have to do some experiments."

We met with the agricultural officials in U.S.D.A. and they said yes, they'd be willing to cooperate. They didn't believe there was any problem but they had to admit there were no data. We didn't know what would...what actually was the situation. The methods were not available, there were not useable methods for determining quantitatively, carbon tetrachloride in fumigated cereal products, or ethylene dichloride. That was our first job, there in the Division of Food.

Vorhes said, "Well, we've got to have some help. We don't have enough people in here that can work on it. I can have Ramsey on it, I can take Munsey off of cereal products and put him on it and that's about it. We've got those two. We'll have to have some people." He got action. I've forgotten what the field service was called at that time, who was in charge of it, but they...we've got to have some people and the people we want are so and so.

One of them was Harry Conroy from Kansas City. He came in and spent a couple months here, and who was the other one...there was a fellow from Boston that came in and also worked on it. We worked for a couple of months and we came

up with procedures that gave satisfactory recoveries in the hands of the four of us who were working on them here. I developed the method on carbon tetrachloride and it gave satisfactory recoveries in my hand. I had Munsey run it, and I had Conroy run it. We gave it to U.S.D.A. and they also got satisfactory results. Munsey worked on the one with the ethylene dichloride, as I remember, along with Conroy and also on ethylene dibromide. We found again that we got consistent results, results that agreed fairly well among us chemists here. We decided that now we were ready to study the problem adequately. Agriculture said well, they would work with...or they would put us in contact with Manhattan, Kansas's pilot mill out there at the University of Kansas. So they milled the various fractions of flour, feed, bran, so forth, and we analyzed all those.

That was a big undertaking and Frank Vorhes was the mastermind of it, I was just really the one who put it together afterwards, pretty much and got the data all together. We were then able to go ahead on the basis of a regulation that was safe because there would not be any residue of carbon tetrachloride in bread. No flour is eaten raw, flour is always cooked in some way or another and in that cooking the bulk of the ethylene dichloride, carbon tetrachloride are volatilized. There's no residue

detectible by the methods at that time what so ever. They were fairly sensitive. Not as sensitive as some of the methods they have these days. I don't know, from what they know now that they might now find some traces...well I don't know, not in bread but maybe in something like gravy, maybe, where the cooking is not too prolonged or too high a temperature.

Anyway, about that time, Congress was also under pressure from the industry to do something about the food additives. Here, Food and Drug wasn't letting them use dehydroacetic acid; it wasn't letting them use dimethyldichloro succinate; it wasn't letting them use chloracetic acid in wine. We took that action shortly after the war, i.e., banning monochloracetic acid as a preservative in wine.

There were a lot of other chemicals that the industry was using that there was a question about, and they wanted the air cleared. The hearings went on for a number of years in Congress, but finally in 1958, the Food Additives Amendment was enacted, which again, followed the same principles as the Pesticide Chemicals Amendment. That is, that the industry now had to prove it was safe before they used it. Well, the problem here was that there were just hundreds upon hundreds of substances that were in use that

remained in the food and nobody knew whether they were really safe or not. It was always expected that they were safe, Food and Drug never got so alarmed about it that they took action on their own, except in these cases that I mentioned that were out and out poisons that were added as preservatives.

Then there was the question of how shall we handle this. Well, then, at that time I was separated from pesticide responsibility, and made the Chief of the Food Additives branch in the Division of Food under Fischbach, and Bill Cook was given the responsibility for pesticides. Things then went on.

There were a number of reorganizations to improve, supposedly, to improve the work of the Food and Drug Administration. One thought was that the research ought to be separated from the regulatory activities. So the Bureau of Biological and Physical Sciences was split into a research bureau, called the Bureau of Scientific Research and a Bureau of Scientific Standards and Evaluation. I was put in the Bureau of Scientific Standards and Evaluation as the Deputy Director of the Division of Food Standards and Additives; Beacham was made the Director.

Lofsvold: About what year was that?

Ramsey: That was in...I should be able to get it...if I had my records I'd get it exactly...those records are at home. I can't tell from this, can I? There's no way to tell from this, I think that must have been in 1964 because I served in that capacity only a few months and I in reviewing this document checked the record, 1964. It came January 1965, the Deputy Director of the Bureau was retiring, Dr. Groves was retiring. He had had enough of Food and Drug. He had been in antibiotics and then he was made Roe's Deputy in this new reorganization set-up. He was retiring and Roe asked me then, to be his Deputy. So I then was made the Deputy with responsibility for the scientific work of the bureau. That was actually my position.

We then operated that way for a period of about a year or so, and it was decided that that was all a mistake, to split the bureau. So, it was all put back together again. This time, it was called the Bureau of Science. They brought in a fellow from the Army, Summerson, to head up the Bureau. He was a scientist of considerable renown, but of course he didn't know anything about Food and Drug. As far as I'm concerned it was a mistake to have brought him in. Anyway, Roe was made a Deputy Director. Well, this was a blow to Bob Roe's pride, as anyone might expect. He was a career Food and Druggier; he had joined the Food and

Drug Administration back in the '20's; and had at one time been an Associate Commissioner; and now he was going to be a Deputy Director of a bureau that he had been Director of.

Well, it was done because there had been some sort of a committee that had recommended that the scientific expertise in the Food and Drug Administration ought to be elevated. We ought to have more people in there who had, I guess, harder training in the sciences, in chemistry, biology and pharmacology and so forth. And so, we had to have a Ph.D director. That's about the way it was summed up and sized up, by many more than myself. Anyway, he served as the Bureau Director then, for a few years and I was made the Associate Director for Regulatory Activities in the Bureau. This meant that all of the petition reviews, the evaluation of the residue data and the adequacy of the analytical data, the analytical method to enforce the tolerances, all of those petitions filtered through my hands on the way to the Assistant Director for Regulations in the Commissioner's office, one J. K. Kirk.

Kirk was a most able man, one of the most able men that ever served in the Commissioner's office. It was said, by one of the District Directors at one time and it was true; "If I want an answer to a question, I don't call the Commissioner and I don't call Mr. Rankin. If I called either

one of those, I would get a fuzzy answer. I would call Ken Kirk and he'll tell me what the Food and Drug position is, if there is one. If there isn't one, he'll tell me what the Food and Drug is going to make it, if he knows that, and I can get an answer." That was true of Kirk. He was very outspoken and 99% of the time he was right. He was not very often wrong on that sort of thing. Anyway, he was the Assistant Commissioner for Regulations. The Bureau Chief, Summerson, said, "I don't want to see those petitions. I don't know anything about them. The only time I'll look at them is when Kirk sends those back because there's something wrong with them. And then I want to know what it is that you're doing wrong, and see if there's anything I can do to help you."

Well, there wasn't anything he was ever able to do to help anybody as far as I know. That isn't to downgrade his science at all. He was a good scientist, he was a knowledgeable chemist, no question about it. He's the one who invented, incidentally, the Summerson colorimeter.

At the Army Chemical Center up at Edgewood, he had done some good work on poison gases. I spent some time up at Edgewood; he was there when I was up there. Incidentally, I didn't mention that. Back in my early days, or back in Vorhes early days, it was thought that the Districts, or

that the Food and Drug Administration ought to be prepared to analyze foods for contamination by poison gases in case there were an overt, or covert gas attack. And so, well ...that analytical method of analyzing foods for gases and so on was the job. Vorhes asked me whether I would be willing to do it, said I would have to go up to Edgewood for a couple weeks, could I do that...yes I could do that, if that's what they wanted me to do. Well, will you go up there for a couple of weeks and study the methods for gases. Now, they don't have any methods for gases in foods, but they have methods for gases in water. You find out what you can about them and when you come back, you're supposed to see if you can apply those methods to food. Well, I did that. When I was up there, Summerson was the Director of the Chemistry Operation, a big chemistry and toxicology operation. All of the animal experiments that they were carrying out to find out how soon these gases would knock people out...and so I got a first hand acquaintance with the G agents, so-called, they're still called G agents. They haven't gotten any less toxic; the fact is, I guess, they've developed some new ones since then, but those were pretty bad.

Those agents were so toxic they impressed me, I'll tell you they really impressed me. The laboratory there, while

I was there watching them perform some of these experiments, the laboratory there needed a small container. About a glass-full of a G-agent was what they needed. They stored these things in separate buildings, so that there would be no possibility of somebody mistaking what was there or anything like it. So in order to get a glass-full of a G agent they sent two men down there, two men to open up that little building and to take out this container and to carry it back up to the laboratory and give it to the chemist. Once when I was there, they spilled one of those bottles in a hood in a laboratory and they evacuated the building. Those were toxic agents. Anyway...

Lofsvold: Was this part of our general program on Civil Defense?

Ramsey: Civil Defense. This was part of the program of Civil Defense. I got back and I got samples of these, small quantities of these G agents, or one of the G agents. One method would work for any of them. I also got a sample of the arsenic, it wasn't called lewisite...what was it ...well anyway it was the arsenic one, and then there was another one, a N mustard gas. I went to work on those methods and got them, so that they would work very fine qualitatively and only just roughly quantitatively but it was good enough to know that if you had that in the food

you didn't want to eat it. I sent out samples to all of the Districts at that time, I think there were 16 then. I had the chemists out there run the samples through and report back the results and we finally reported to the Commissioner. We believed we were able to detect a food that contained one of these agents but that the belief of the scientists at the Army chemical center and our own belief was that, even in the case of a gas attack it was quite unlikely that food would be contaminated...but anyway we did it. That was the story of the G agents, that was the story of the chemical war if I recall, in fact we called them chemical warfare (CW) agents.

Incidentally then, I served on one of those committees, one of the, well, I say committee, actually it was a hand-picked group of people from Food and Drug here in Washington to take charge of whatever Food and Drug activities there would be if Washington were to be destroyed. Rankin was the head of the committee, and I served on it with this group as the food representative and there was somebody on drugs, and it seems to me there was some field man who would operate in that area. There were about 4 or 5 of us who would leave Washington when we were notified to do so, and go off down to a designated place and await for the attack to occur and the capital to be destroyed, and take over running that part of Food and Drug from that center.

Incidentally, while we were involved in this kind of thing, we were taken up to the so-called 'Little Pentagon' in the mountains of Virginia. We visited up there and it was a mighty impressive thing. The Little Pentagon is carved out of a solid stone mountain and it is self-sustaining, self-supporting, it is essentially bomb-proof, at least the best they can do. I don't know whether it would withstand one of the...it might not withstand an H-bomb. At that time it was thought it would withstand the ordinary atomic bomb. We visited up there just to see what the facilities were at that time. In case of an attack on Washington the President would be sent up there, the President and some of the Cabinet members, and the top government personnel. Funny thing...in the newspaper here a few years ago, they asked Senator Byrd whether he was one of those from Washington who was going to be saved, if Washington were to be destroyed by a covert attack, by a foreign power. "Well," he said, "I don't know. The installation is up there in my state but I don't know whether I'm on the list to be saved or not." Well of course, the 'Congressmen weren't on the list. It was just a really small group of people from the Washington area who were deemed to be essential for the operation of the government who would make their way up to the Little Pentagon, up there in the mountains.

Well, I think I'm getting off on some side...side tracking here. Now let's see; the last that I had in my progress was that I was the Associate Director for Regulatory Activities in the Bureau of Science. It remained that way. My work load at that time was really quite heavy. I really put in an awful lot of overtime as many Food and Druggers did. I always thought, when I was down in the ranks, you know, as a junior chemist, that the bosses never worked. They were the ones that took it easy and they just told us what to do. I found out, as I moved up, that usually the higher up you got the longer hours a man put in.

Bob Roe was one of those who worked long hours, day after day after day, and was really I suppose my role model because I did the same thing after I began to work with him, or work closely with him.

Then "Silent Spring" came along. I guess that was about '63 or so. I can look up the dates on some of these things I got those here. And stirred the country all up and gee whiz, Food and Drug wasn't doing right on these pesticides at all. So, the Food and Drug's usual response in cases like this was to seek an advisory committee's opinion on what ought to be. And so President Kennedy got involved; really this time it was at the top. It was out of

Food and Drug's hands. He appointed a Science Advisory Committee to look into the use of pesticides. The committee recommended that the concepts of zero tolerance and no residues be reviewed and that the accretion of pesticide residues in the environment be reduced by orderly means, and that persistent pesticides be eliminated, or at least that be kept as a goal.

Shortly after this committee was set up, 1963 (it's one of those critical years), gas chromatography came in. We got a gas chromatograph in the Division of Food, and it was not too long after that, perhaps about 2 or 3 years until the Districts were all equipped with gas chromatographs. The methods were worked on. Bill Cook was the leader, Bill Cook and Henry Fischbach were the leaders in that area in Washington. But there were people working on pesticide residue methods by gas chromatography in the universities, and in the Department of Agriculture and so progress was just dramatic. We soon found that we could detect DDT residues in milk, at a level of .05 ppm DDT instead of .10, whereas we had had an actionable level of .10. On October 13, 1963, we set the actionable level, or we reduced it to .05 ppm. We reduced the actionable level for dieldrin and heptachlor epoxide residues in milk to 0.01 ppm, or 10 parts per billion. These were levels that were just simply

not approachable under the old colorimetric and fluorometric methods we had used for pesticide residues up to the advent of gas-liquid chromatography.

There were some other developments here about that time that raised questions. There was the milk situation, oh, well, Kirk actually made the decision, the Commissioner simply went along with it, yes...we have got to reduce it. When he sent out that letter to the state officials, that the actionable level was going down to .05, that really created a furor, because, they began finding levels of that kind in a high percentage of the milk of the country. The Department of Agriculture was really upset because they had registered a number of uses of aldrin and dieldrin and heptachlor in the production of dairy feeds, such as alfalfa and corn silage and these were the major contributory factors to the residues in milk. Well, the farmers of course, were up in the air when they couldn't sell their milk. They went to their Congressmen and their Congressmen were very sympathetic and so Congress enacted some compensatory legislation to pay these farmers who were not at fault. I don't know. George Irving said at one time that that ran into millions of dollars. I never did know, never did see the figures on just how much that really amounted too. But it was a tremendous thing.

Then a little later on, we had agreed that there would be no residue of endrin on such crops as cauliflower, cabbage, brussel sprouts and broccoli. The method was sensitive to .10 ppm., and way back there in the '50's, when we looked at that old phenylazide colorimetric method we had decided, yes, by that method there were no residues and thus the registration could go forward. We began finding those residues of course, by gas chromatography. We were right, they didn't exceed a .10 ppm but they were in the range of a few hundreds of ppm. So we had another advisory committee. We had a lot of advisory committees in those days. An Endrin Committee to look into the establishment of a tolerance as high as a 10th, and they recommended against it, that wouldn't be safe. The Department of Agriculture then had to cancel many of those no-residue label registrations, in which we initially agreed that there would be no residue, but of course we were always agreeing based on some method that has some limit to it.

Then it was decided that there ought to be a joint USDA/HEW advisory committee to look into the concepts of no residue and zero tolerance registrations. And so we had the so-called Zero Committee; it was appointed and reported April 13, 1966. Food and Drug and Agriculture jointly published a statement of implementation in the Federal

Register, and in essence this committee found, and the Food and Drug and Agriculture agreed, that the concept of no residue and zero tolerance was scientifically and administratively untenable. It recommended that they be replaced by registration based on small finite tolerances to cover these negligible residues.

That was essentially then, the end of no-residue registrations. There weren't any more, but it was not the end of zero tolerances because we had the Delaney Clause to contend with, under which one couldn't set a finite tolerance. The Delaney Clause, of course, carried over as a matter of policy, into the raw agricultural commodity area; we couldn't treat one differently from the other. There was a great deal of unrest, a great deal of dissatisfaction in the industry, a great deal of dissatisfaction among consumers, among consumer groups over FDA's handling of the pesticide residue problem. I don't know what they expected; after all science does move forward. Anyway, that was the situation.

Then about that time of course, there were criticisms of Food and Drug management. Food and Drug really wasn't being managed right and all that sort of thing. What finally, well, there were other problems, and of course I was involved in all of these as being the essentially, the

scientific coordinator in the Bureau. There were criticisms of the safety data that would be furnished by the Division of Pharmacology, or Toxicology as the case might be and the chemists appraisal. I was essentially at the center of all of that controversy.

The cyclamates was a case in point. There was a feeding study done of the cyclamates with a saccharin ratio that they normally used, 10-1 as I recall it, by the Oser Laboratories in which the rats got bladder cancer. That was really something. Ben Oser came down to see the Commissioner to tell him that they'd found this. At that time cyclamates were in essentially all soft dietary drinks. It was in drinks that were given to children as well as to adults; it wasn't restricted. The Commissioner was quite concerned. He told the, whoever it was that was his chief liaison over in the Department, the health man over there...and gosh, this is really awful. It was awful. It was awful as the following events indicate. The doctor over there in the Public Health Service who was, I've forgotten the Commissioner at the time, I guess it was ...Ley, Herb Ley, that's who it was. Herb Ley. We'd had Goddard and now we'd got Herb Ley. Herb Ley was a physician, he appreciated the seriousness of the situation too. So they said, well, let's have the slides looked at by a

real honest-to-god expert. Who's the best one? They decided that some cancer expert out of Boston was the one who should look at, the slides who should look at, the slides to tell whether or not that tissue was really malignant tissue. He looked at it and confirmed yes, there isn't any question about it. All of us down at the working level really didn't know anything about this. The fact is that the Assistant and Associate Commissioners didn't know anything about it, including Kirk. It was decided that they would have to have a regulation that would ban cyclamates and that it should be done on a Friday, after the stock market closed. The only person that got into it I believe was Billy Goodrich, I think Billy Goodrich, the Commissioner himself, Herb Ley and the representative from the Department of Health Education and Welfare, drafted that regulation, got it into the Federal Register and all hell broke loose the next week. Oh man, this cyclamate was not just in soft drinks although that problem was tremendous; it was also in artificially sweetened fruits. The economic involvement was just enormous. Well, the economic impact was so great that the Department thought Food and Drug ought to be shaken up. Ley was dismissed, Kirk was dismissed, and Rankin was dismissed, but of course Rankin and Kirk were given the options of, they were career

people, were given the options of taking jobs in the Department if they wanted and Rankin did. He didn't quite have what he wanted for retirement; I don't believe he was even 55. Anyway he went over to work a couple of years in the Secretary's office. Kirk just simply took retirement. Herb Ley of course, bowed out of the whole thing.

Lofsvold: And that was, you think directly attributable to the controversy?

Ramsey: Oh, that was the cyclamate controversy. It was cyclamates you see; saccharin wasn't touched yet. There was nothing advance on saccharin, it was all attributed to cyclamates.

This all happened in December. In March, the President decided he'd had enough of Finch, too. Finch lost his job. The official explanation, or the explanations in the paper, and they are apparently the right explanations, was that Finch had trouble managing the department. But it was all this stink by the industry. The industry, as you know, was just flabbergasted, and it just took them a long time to get over it. I don't know as they ever got over it.

When the saccharin situation came along, Congress decided that they'd take a hand in it, so we still have saccharin on the market. I was involved in all of those,

either in writing letters, reviewing letters from our Bureau, in deciding what we ought to do with regard to regulatory methods for those substances, what method would have to be used and so forth. It was a real monumental disaster.

The Cranberry Disaster of a few years before, which I was also involved in, was just minor compared to this; it was just minor. Yet, that Cranberry Disaster upset people too. It really upset the Cranberry industry and gave it a black eye that it took years to recover from. A lot of people wouldn't eat cranberries for many years.

Well let's see now, there are a lot of things that I haven't touched on yet. There was all this dissatisfaction with pesticides that led to the appointment by Finch, of a Secretary's Commission on Pesticides and Their Relationship to Environmental Health. Now, that was appointed in 1969 and they were to report in 6 months, and they essentially did report in 6 months. This came out, the first part of this report came out in December 1969, and the rest of it came out shortly after that. That committee, reporting on pesticides again, went all over the grounds and made extensive recommendations the gist of which was that pesticides are contaminating the environment: you've got to cut down; you've got to get rid of persistent pesticides. More than

that, the Department of Agriculture and the Food and Drug Administration were not giving adequate consideration to contamination of the environment. All they were concerned about was the food that the pesticide was used to produce and they didn't really get into the problem of soil contamination, air contamination and so forth. So the Secretary of the Interior ought to have a stronger voice in it. The White House of course, was informed, was kept informed on all of this and they decided, eventually, that what they really needed was a separate agency to take care of the environment. So they set up EPA and transferred the petition review for safety of pesticides from the Food and Drug Administration and lodged it in this new agency, the Environmental Protection Agency. They pulled out all of the pesticide people in Agriculture, who had been involved with the usefulness of pesticides, and with the registration of the labels. All of those people went over.

I was invited to join the group, but at that time I was getting close to retirement age, of voluntary retirement age; I was voluntary retirement age. Did I want to join a new agency or didn't I? I thought to myself, my God, I've been more deeply involved in food additives anyway, than I had in pesticides, although I had been concerned with both, and so I declined to go over and join the group. McFarland

did go. He was the top man from Food and Drug who went over. He was in charge of the Petitions Control Section which processed the petitions on pesticides and food additives.

Lofsvold: I think, Les, we ought to read into the record the name of this book so that anybody would know. It's the report of the Secretary's Commission on Pesticides and Their Relationship to Environmental Health, Parts I and II, published by the Department of Health Education and Welfare, December 1969. Isn't this the Commission that Emil Mrak, from...

Ramsey: He was the chairman.

Lofsvold: ...U.C. in Davis.

Ramsey: Yes, that's right. He was the chairman and it was a very able Commission. Its a very great, fine report and as of that day, that was the last word on pesticides. No question about it.

Al Kolbye was the Secretary to the Commission and afterwards joined Food and Drug, and became the Deputy Director of the Bureau of Foods with Wodicka as the new Director. I was made then, at that time, in that reorganization, I became the Assistant Director of the Office of Compliance. Tom Brown headed up this office. Afterwards, after Tom Brown left, a fellow by the name of

Angelotti headed it up for a while and he got into some trouble over an expense account or something was...had to resign.

Lofsvold: I think that was after he left us and went to work for the Department of Agriculture in their Consumer Services branch that he had that problem.

Ramsey: I guess that was it. Yes, he went over there, that was it. He got involved over there.

Well, there had been some other developments along the way that I was involved in, but I guess we have hit the high spots.

I don't know whether I...I guess I haven't said that over all of the years beginning with the passage of the Food Additives Amendment, for some reason or another, I became one of the principal speakers from the Washington office on food additives and on pesticides. In time I had moved over, out of the pesticides at the laboratory level, or at the division level when I moved up into the Bureau level and had the overall responsibility for overseeing both activities. Then I was involved in being a spokesman for the Food and Drug Administration in the scientific and regulatory area. I did write a terrific number of speeches. Incidentally, that was the day, and I don't know how it is now, but in that time when a speaker went out

from a Bureau in Washington, to speak to a group, you could rely upon what was said as having been cleared by the Administration. Somebody in the Commissioner's office would have read and approved that speech on the basis that it was factual and represented the policy of the Food and Drug Administration in that particular area. However, a speech was not necessarily cleared with regard to minor scientific data or facts or anything like that, but there wouldn't be anything contrary to Food and Drug policy in it. In my last days at Food and Drug, it seemed to me that that policy was slipping. Back in the days when Kirk and Rankin were the key people in the Commissioners office, you could be darn sure that when anybody went out to make a speech, that he was talking right out of the Commissioners mouth essentially. So, all my speeches were cleared except in the last couple of years when Wodicka was Chief of the Bureau of Foods. I know I made a presentation in Geneva one time that the Commissioner's office never saw. I don't think they wanted to see it, but I don't know if that was all for the good or all for the bad. I thought back in the days when we had tight control, you knew what the facts were. If you were out in the field, or no matter where you were. Down in the Bureau someplace, you picked up one of these speeches and when you read it, you knew that that was

what Food and Drug was going to do and by God, you'd better watch out!

Lofsvold: In your outside activities, Les, were you involved with A.O.A.C., the Association of Official Agricultural Chemists, I think that was the original name of it?

Ramsey: Yes, it was. Yes, I was involved almost from the beginning in one capacity or another. When I first joined Food and Drug Administration, with Robert A. Osborne as my immediate supervisor, he was active in the A.O.A.C. and he had me do some collaborative work that he was interested in, along with chemists from the field. So for a number of years I collaborated on analytical methods of one sort or another, usually, on matters relating, always on matters relating to food.

Lofsvold: That means that you used a method developed by someone else to see whether it would work in your hands?

Ramsey: Yes, and other chemists would analyze the same samples. In a collaborative study, I should make clear that a number of chemists had all analyzed the same samples to see if they all got the same results, or essentially the same results, whether the agreement was good enough so that the Association could adopt that as an official method.

Then later on, when I developed methods of my own, I was made an Associate Referee, and later on a Referee of methods. I would send out these samples and other people would... usually there would be one from the Division of Food, besides myself who would analyze the samples and then they would usually have at least 3, sometimes 4 or 5, from the field districts to analyze the same samples. One of them for example was, dimethyldichlorosuccinate that I spoke of a few minutes ago. That method was tried out in the field districts under my refereeship.

Then, of course, as time moved on and my responsibilities changed somewhat, my responsibilities in the A.O.A.C. changed. I became more of an advisor and then I served on one of the committees. Committee C it was at one time, that passed on the methods, on the food methods, analytical methods for analyzing various components of food and food contaminants and that sort of thing.

Lofsvold: That means you evaluated the whole picture, the collaboration and so on, to decide whether or not that should become an official method?

Ramsey: Whether it should become an official method, whether the recommendation of the referee...we wouldn't consider it unless the referee had said, in his opinion, this method should be adopted. Then it would go to the

Committee and the Committee would then decide whether or not they concurred with the referee. Usually it was just a matter of routine. There were times when there would be a difference of opinion, when the referee apparently was a little over zealous or maybe it was his pet method or something. And he thought it was good enough and the Committee might decide that well, the results were not that consistent and not that reliable.

Then after a while I was put on the, I served on the official, what was the official board called in the early days...whatever it was called I served on it. I have it here...anyway... Once you have become a member of the, I guess it's called the Board now, I've forgotten what we called it in those days, was it the directors? Board of Directors, or the Official Board, or something, or anyway... Then you move up in about 5 years time from the lowest position of Board member or Director, you move then on up to Vice President, and then to President, and I served in both of those capacities eventually. I was elected in 1971, served through the year '72 when the new president took over, and the following June I decided to retire, in '73. Yes, I was active in the A.O.A.C.

Lofsvold: In these interviews, Les, we have been asking people to talk a little bit about their experiences with the various Commissioners. What kind of circumstances they met them under and any kind of experiences, anecdotes that would illustrate the character and personality of these men who led the organization. Can you do something like that?

Ramsey: Why yes, I think so. When I first came to Food and Drug, Walter G. Campbell was the Commissioner, and he was held in considerable respect by all of the people I came in contact with. He was a man of the highest integrity and of great competence. He was the one that set up the early enforcement system of the Food and Drug Administration. He was originally an inspector. Under the Food and Drugs Act of 1906, the Bureau of Chemistry in Agriculture had the responsibility for administering that law. It was decided in 1927 that the research activity ought to be separated from the regulatory activity, and when that separation was made, Walter G. Campbell was appointed the first Commissioner. The title of Commissioner of Food and Drug stems from that date. At that time it was the Food, Drug and Insecticide Administration, but the Insecticide was dropped out of the title along in the early '30's. The fact is the insecticide responsibility was given back to Agriculture along about the time of the agency reorganiza-

tion of Roosevelt in 1939 after the passage of the 1938 law. Yes, he was held in the highest regard. His deputy, Paul B. Dunbar, was a graduate of Johns Hopkins University with a Ph.D in Chemistry and did quite a lot of analytical chemistry in his early days in the Food and Drug Administration. And again, I'll say this right now for all the Commissioners that I served under. They were men of the highest integrity, men of great capability and certainly, not a one who wasn't qualified for the job. Now, it may well be that things happened that they had little control over and that they didn't last long on the job. Nevertheless, these men were all of the highest type.

Paul B. Dunbar was also a highly moral individual. The story is told, and I don't vouch for its truth, but the story is told about an employee in Washington who was a Division Chief. Heiny Lepper is the one who knew all the dates and the names of the people involved and what happened. It's from him that the story comes, I don't remember the names at all, or even the exact dates. Anyway, this Division Chief had an affair with his secretary, she became pregnant, he sought a divorce, which he was going to get, but he didn't want to remain in Washington to be near his ex-wife with this situation. He went to Dr. Dunbar and asked "Dr. Dunbar, would it be possible for me to have a

transfer to the field?" "And why do you seek the transfer?" inquired Dr. Dunbar.

The Division Chief told him very frankly why he sought the transfer. Dr. Dunbar responded decisively: "You can have your resignation on my desk in the morning or you will have a letter of dismissal." Yes, that was Dunbar. Back in those days we were a moral agency.

Lofsvold: That sounds just exactly like him. I remember a story that a microbiologist, Bob Shelton, told me along somewhat similar lines. When Bob came to be interviewed for a job and he was actually interviewed by the Commissioner, he didn't know about it, but a life-long friend of the family, a Congressman who lived next door to them had written a letter of recommendation to Dunbar. The first thing in the interview, Dunbar asked him about this letter and was obviously incensed about the Congressman writing to recommend this kind of appointment. Shelton was completely ignorant of it, flabbergasted and obviously showed it. Dunbar said, "Well, you know I believe your story that he wrote it without your knowledge or without your request. If I had thought otherwise, I would not consider you for the position."

Ramsey: That sounds just like Dunbar, he was very capable, he was a very capable administrator, but he didn't last as

long on the job. Well, I guess I'll go back and say that I guess the Commissioner who served the longest period was Walter G. Campbell, as Commissioner, from 1927 until 1943. I came in '42 and I think it was the following year that he retired because of the ill health of his wife. Dunbar became Commissioner in '43 and stayed on until right around 1950, so he did not serve nearly as long.

All of the Commissioners since then, well, now let me see...in 1950 Crawford took over. Crawford recognized immediately that he had a problem. This was the year that he had the appointment, it was the year that Eisenhower was elected. Eisenhower appointed Hobby, this newspaper person from Texas, Mrs. Hobby as the Secretary of the, well...I guess then it was that year that he made the Federal Security Agency which was the agency we were a part of under Roosevelt's reorganization act. He converted that agency into a department under Hobby, and Hobby was the first Secretary of the HEW.

When she became Secretary of HEW she thought that her immediate servants ought to be her appointees and so she was going to fire Crawford and she was going to appoint a person of her own choosing. Well, there was such an uproar from the regulated industry over mixing politics with Food and Drug regulatory activities that were supposed to be

concerned with health, that the industry persuaded her that that would not be in the best interest of the Republican administration of Eisenhower, and she'd better not do it.

So she tolerated Crawford, and he knew that he was only tolerated. He just didn't get along with her after that and so he retired. He served such a short period I guess it's kind of difficult to appraise progress under his period of Commissionership. But under Dunbar's we certainly moved forward, there's no question about it. There was this great progress during the war, of course, in assisting the Army on antibiotics. There was the progress in meeting the challenge of food additives...let's see, that came under...no, no the amendment came under Larrick's Commissionership. No it came up to the Food Additive Amendment, but the Amendment actually was in Larrick's... yes he...see Eisenhower was elected in '52 when he took office in '53. Before he took office, and before Hobby was appointed, Dunbar had retired and Crawford had become Commissioner. So the progress on pesticides had been under Dunbar.

Incidentally of course, we used to have in the Food and Drug as you know, there in the old Food Division the so called Liars' Club there in the canning technology room. When I first joined Food and Drug, Dunbar would come down and chat with us, he did not always eat, but he would

always bring a cup of coffee and chat with everybody around. And so I knew him from, to some extent, just from having heard him talk. I never did talk with Walter G. Campbell. All I know about him is hearsay of course, but Dunbar I knew personally. One time years after he retired we had a Division of Food picnic, up at the Wahlstroms, up in the mountains, and she had invited Dunbar. Here I saw old Dr. Dunbar coming and I was standing...I don't know with a group of people here and he walks up to me "how do you do Les?" Remarkable memory, that guy had the most remarkable memory of any individual I ever knew. He knew many, many people by their first names in FDA. What contact did he have with me? I was a lowly junior chemist down there in the Division of Food. Of course, I moved up a little bit under his Commissionership, but really I never had any contact at all with him, other than the Liars Club and meeting him in the hall, and just saying hello and that sort of thing, and yet he called me by my first name without any prompting. I watched, he was coming up with a group of people; nobody prompted him. Other people have remarked on his remarkable memory. It was just really something.

Well, Charlie Crawford, of course I knew much better, because he attended the Liars Club regularly for years before he became Commissioner. He is the only Commis-

sioner, incidently, who ever came down to my laboratory to visit. At the time I was working on the methods for the chemical warfare agents, he came down to my laboratory and sat down and said, "Les tell me what you are doing." He is the only commissioner that ever did that before or since and I told him about my work. He was interested; he wanted to know what this was all about, but of course he knew what the overall objective was.

Then, of course, there was a later Commissioner who succeeded in doing more for Food and Drug than even Dunbar did, I would say he did more than Campbell. Of course, Campbell really got the Food and Drug launched on the right road and Dunbar carried on, but Larrick was an extrovert. He was a very capable guy, he didn't have a college degree, and yet he came into the Food and Drug Administration at the bottom as an inspector and went to the top and I'll tell you anybody who can do that even in those days, had something on the ball. He was a very capable, very perceptive guy; he got along very well with Congress in the early days of his administration, very well. Our appropriations came along very nicely and it wasn't until the latter part of his term when there was all of this hullabaloo over drugs. The Food and Drug Administration was not doing right on drugs; they were approving drugs that shouldn't

have been approved, that sort of thing. It came out in the newspapers and Herblock the famous Washington Post cartoonist, Nobel Prize winning cartoonist, had a cartoon one time that showed what the newspapers thought about the Food and Drug Administration at that time. The cartoon at the top had the words "The Food and Drug Administration" than it had a group of people in here, white coats and what not and then down below "Or The Food and Drugged Administration" that was his cartoon. And there had been problems in the drug area. There have always been problems in the drug area. I have never worked in the drug area except, incidentally, with regard to those drugs that were also pesticides. There are human drugs, at least there were when I was there, under the laws at that time, they have been changed a little, and I'm not sure what the situation is now. But at that time it was possible for a substance to be a human drug, subject to the drug provisions of the Food Drug and Cosmetic Act; to be a pesticide subject to the Pesticide Chemicals Admendment; and to be a pesticide also subject to FIFRA, the Federal Insecticide Fungicide and Rodenticide Act, administered by Agriculture. Agriculture would have registered labels of this substance for its pesticides uses. So except for that little bit, I have had no connection with drugs except later on, of course,

under the Food Additives Amendment when they split the Bureau of Drugs into the two bureaus, one the Bureau of veterinary drugs and the other one, the human drugs, the Bureau of Medicine. Then I was involved to quite a marked degree with veterinary drugs. The question was whether there were residues in the tissue. If there were, why those were Food Additives under the Food Additives Amendment and there had to be a food additive regulation for those residues or for use of that particular substance. I don't know...it's been so long and I was so loosely connected that I just can't say first hand what it was that led to that cartoon and to the newspapers and the public's reaction to the Food and Drug Administration.

Up to within just about the last year or two that Larrick served, up to that time the Food and Drug Administration had only friends in Congress; there weren't any enemies. We would go up there and get the appropriation we wanted. Except as I say under Hobby, who held us down in one year to four and a half million dollars, total budget. It was the first RIF and the only RIF that the Food and Drug ever ran in Washington. We actually laid off people, I don't know about the field.

Lofsvold: Yes, it happened in the field too. In fact, my job as a Food and Drug Officer was abolished. I had to go back to being an inspector.

Ramsey: You were glad to hold on to it, I bet.

Lofsvold: Indeed I was, those were rough times. That was 1953.

Ramsey: Anyway, Larrick got along with the industry, he got along with the public and he got along with Congress remarkably well. He appointed a Citizens Advisory Committee to advise on an expanded role for Food and Drug in society, for an increased budget to be able to take care of the responsibilities and there was a Citizens Advisory Committee report. There was a report that had to do with the reorganization of Food and Drug. I believe that that was under Larrick's Commissionership.

Lofsvold: I think that is correct.

Ramsey: I believe that's right. He had Harvey as his deputy and Harvey having had that background of experience in the field and being a lawyer of a sort, he was influential too in keeping Larrick on the right track and then, of course, Larrick very soon got Kirk and Rankin into the office there.

Kirk had always been, up until he was assigned to Boston as a District Director, had always been involved in the Interstate Section or whatever they called it back in the old days, so he had always had some involvement with high policy.

It was decided that Food and Drug hadn't been well managed and the Secretary would look outside for a Commissioner. Rankin served as Acting Commissioner for only a short time, and this was the days of the Excellence Man, the secretary of HEW who was...

Lofsvold: I know who you mean...John Gardner.

Ramsey: John Gardner. Did you ever read Excellence?

Lofsvold: No, never did.

Ramsey: Well there's no question, he was an intellectual. He wasn't really very well informed about the agency or about the Food and Drug Administration, but his heart was all in the right place, he afterwards, set up this...

Lofsvold: Common Cause.

Ramsey: Common Cause. You see, he was a do-gooder; that's what he was; his heart was in the right place; some do things differently, but there was public criticism of the management of Food and Drug. So he would go outside and he would get somebody who was top notch. He went down to Public Health Service, outside of the Food and Drug. Up to that time you see all the Commissioners had come up through the ranks, of course, everyone of them. He went down and got Jim Goddard from the Public Health Service.

Somebody one time said in a sort of a snide remark "All that Jim Goddard really knew about medicine, was what

he learned while he was a VD control officer". Well, I think that is not fair. I wouldn't want that to be on the record that that is what I thought of Jim Goddard. He did have some pronounced ideas on what he was going to do to Food and Drug and he did make some drastic changes. I knew Goddard too, very well. He was a down to earth guy, very personable guy. He would get on the radio and he could just charm the dresses right off the women consumers of the country about the Food and Drug Administration. You may have seen him on TV. He was tremendous, and his public speeches were tremendous.

I got to know him very well, because he asked me and Reo Duggan to go with him and the Assistant Secretary of Agriculture on a trip to Bonn, Germany to review the pesticide tolerance problem with the West German Officials. It was at a time when there was a pretty pronounced disagreement between the pesticide tolerances Germany was establishing, and our pesticide tolerances. And, of course, that blocked the flow of goods to a certain extent, at least it made it not as easy. I went with him, along with Duggan. Goddard was a very capable guy; he was kind of an earthy sort. He could tell as dirty a story as the next one.

Then following Goddard...let me see what did he do, oh Goddard crossed Johnson. He went up on the Hill, as you remember, you saw this, all the newspaper story. He testified in one direction, the policy of the Johnson Administration was in the other. If I stopped and thought about it I could probably get the details of it, but anyway that was it and so Goddard resigned.

Lets see who came in after Goddard, was it Herb Ley?

Lofsvold: Yes, Herb Ley.

Ramsey: Well, I never got as well acquainted with Herb Ley, he wasn't with us too long, about two years or so, and I never really...

Lofsvold: Actually I think he was Commissioner for only about a little over a year.

Ramsey: I think that's right, the cyclamates did him in. Nobody could of survived that, it would have made no difference who the commissioner was. He would of been out on his ass; Secretary Finch was out on his ass; nobody could have survived that. That was an economic debacle of a magnitude the country hasn't seen before nor since as far as the Food and Drug is concerned.

Then after Herb Ley... Herb Ley, as I say, I really didn't get to know him very well, yet he is the one who presented me the FDA Award of Merit. I guess that's really

the last Commissioner that I really knew, the next guy was who?

Lofsvold: Charlie Edwards.

Ramsey: Oh, yes, Charlie, of course. Oh, yes and that deputy of his...

Lofsvold: Jim Grant.

Ramsey: Jim Grant. About that time Jim Grant decided, or maybe Edwards decided, anyway Edwards came from this high powered industry management agency. They were going to revamp the management of Food and Drug. Going to do some further reorganizing and what not. So they set up an Inter-bureau Committee. I was the representative from the Bureau of Foods, on that committee, so I got to know Jim Grant I guess a little bit. I really didn't get to know Edwards that well. That was the end of it then, I retired.

Well, I would have to say that those people, even Jim Goddard of whom it was said he really didn't learn much about the Food and Drug Administration; he wasn't with us all that long. They were all men of integrity. They were all attempting to operate in the interest of the consumer. The agency's decisions really were not politicized to the extent that they became subsequently...so I understand at least, of course my news always comes in directly now. Al Kolbye has been pretty disgusted with the way things went,

that was probably subsequent to 1973. Things had become quite politicized with the later commissioners. That I don't know.

About the supervisors and superiors that I had in Food and Drug. I suppose I was one of the lucky ones. I know that not every Food and Drug employee could say, as I can, honestly, that all of the supervisors I had beginning way down at the bottom, all the way up to the top, these were all of the finest men that you would ever want to meet. They were all capable. They were all honest. There wasn't a one of them who would cut the ground from under you. Not one. At the top of the list I would put Bob Roe. He was my idol.

Lofsvold: You know he was my first boss, too.

Ramsey: Oh, he was?

Lofsvold: He was the Chief at Seattle when I reported there in 1939.

Ramsey: Is that right?

Lofsvold: I would agree. He was one of the finest men I ever knew. You know what you just said has been said in different words by almost everybody that I have interviewed.

Ramsey: Well, I know that some of the employees have had problems. Now, for example, maybe I can't get the names

anymore...the antibiotics people...Jester. Bill Jester and his assistant, what was that other guy's name? It doesn't make any difference anyway.

Anyway there was an antibiotics specialist that served with Bill Jester. Bill Jester wasn't a scientist.

Lofsvold: I think he was an administrator. Was the name Dilorenzo?

Ramsey: Dilorenzo, those two guys I didn't think got a square deal.

Lofsvold: Well, from what little I have heard of the case there were serious questions, too. They were blamed for things which were not at all their fault.

Ramsey: It wasn't...of course, I was in the same Bureau at the time. I had so little dealings with Bill Jester and Dilorenzo, but when this happened the Commissioner himself wasn't available when it came to a climax. It was Rankin who relieved them of their positions.

Summerson was the Chief of the Bureau. Summerson was not a Bob Roe when it came to dealing with his employees. He did not make any effort to see what the problem was, or to clear it up, or anything else.

Rankin just relieved those two guys of their jobs and they sat around. They came to work for about a month, with nothing to do. Finally Bill Jester was assigned as Kirk's

assistant, which indicated that he couldn't have done anything very bad, or Kirk wouldn't have had him.

No, I thought that that was the one mistake that Rankin made. I never did see any reason for that. Of course, I never saw the details. The details were never made public to us in the Bureau. It never came out as to precisely what the facts were. We never did know.

So, I would think that if you were to interview Joe Dilorenzo or Bill Jester they couldn't make that same statement, I believe...I don't believe they really...well they didn't think they got a square deal, I know that. I talked to them. At that time they thought it was just outrageous because I did talk to them about it.

Well, I think what little progress I made in Food and Drug I owe to those very capable people who were guiding me along, kept me on the right track. Of course, I had an awful lot of help from below too. I sure did. I had very fine support from beneath. They were all there to do their job, get their job done.

I could call for overtime... One time this guy Grant had to have some sort of...Lindsay was the Assistant Commissioner for Science and they called on me in the Bureau to make some sort of a comparison between the recommendations of the White House Conference on Aging, with regard

to Food and Drug, and to check those recommendations as to what the law provided and what our policy was and what we should be doing. I went to work on a document that was comparisons, in order to see the thing on one sheet the sheet had to be about so big. We had this thing printed up and he was in a hurry to get it so he could look at it and see what we were doing that wasn't what the administration wanted. So, I had to ask the girls one time to work overtime, I guess they came in all day Saturday and all day Sunday to get that thing typed up. They willingly did it; of course, they got overtime for it. They came in and they typed and we got it to Grant promptly and it was what he wanted.

With regard to some of my other people who were so unfortunate as to have to report to me. With regard to them, some of them put in an awful lot of overtime.

Frank McFarland was one of those. He was in charge of the Petitions Control branch. It was one of those pressure points. To get those petitions out on time or explain why you didn't or explain why you are not doing it.

Bill Horowitz, there was another work horse. Bill never really ever worked for me directly. No, I worked with him. We were more or less co-equals all along. He is a work horse, a real workaholic if there ever was one. I don't know how he ever managed to raise a family.

Well, that is all I have to say at the moment, unless there is another question about some other aspect that I might know something about.

Lofsvold: I can't think of any further questions, Les, and I do want to thank you for taking the time to talk with me. I think that this recording will help us fill in some of the gaps in the history of the agency and will be very useful for the project. Thank you very much.