

Framing — the absolute and the round number (*alternative opening*)

A candidate frame for the series, succinct by design. It uses two long-serving congressmen as emblems of the two answers American law has given to the question the whole series turns on. Facts verified; sourcing in [../ssd/SSD_MANDATE_AND_POLITICS.md](#). One of several candidate framings — compare the conference-open and linear openings in `de_minimis_draft.md`.*

How much of a poison is safe? American law has given two answers, and two of its longest-serving congressmen stand for them. They were not rivals — one a Queens Democrat, the other from downriver Detroit, their careers only partly overlapping — but between them they fix the poles, and the distance between those poles is what this series measures.

James Delaney's answer was a line in a statute. From 1950 he chaired the House committee that spent two years examining the chemicals moving into American food, and in 1958 he attached to the new food-additives law a single sentence: no additive may be approved that is "found to induce cancer in man or animal." No safe amount, no exception, no judgment to be made. The premise beneath it was plain — for a substance that causes cancer there is no dose low enough to be sure of, so the law should not pretend to name one. Delaney expected the clause to reach only a few chemicals; as the instruments improved and trace carcinogens turned up everywhere, his one sentence hardened into the most absolute command in American food law. He was, by trade, a master of procedure — he would end his career chairing the Rules Committee — and his lasting mark was a single refusal to calculate.

John Dingell's answer was a method. The longest-serving member of Congress in the nation's history pressed agencies harder than almost anyone — in 1967 his oversight subcommittee forced the FDA to account for how it handled the chemicals migrating out of food packaging, the pressure that produced the conference where John Frawley pressed his exemption on the agency directly. But Dingell pushed agencies to act and to answer, not to obey a number. His landmark, the National Environmental Policy Act, forbids nothing; it compels agencies to study and disclose. His tool was process: "I'll let you write the substance," he said, "you let me write the procedure, and I'll screw you every time." And he balanced. For half a century he was also Detroit's man in Washington, defending its automakers — trading protection against jobs, the same weighing the 1965 water-quality act performed when it set "propagation of fish and wildlife" against "agricultural, industrial, and other legitimate uses."

These are emblems, not adversaries. But the two philosophies are real, and the regulation in these essays lives entirely inside one of them. The threshold — Frawley's 0.1 part per million, the inherited factor of one hundred, the fifth-

percentile HC5 that now sets pollution limits for whole rivers — belongs to Dingell's world: an accountable agency drawing a calculated line between protection and use. It is the round number reached for to fill the place where knowledge runs out. Delaney's was the other answer: where you cannot know the safe dose, do not invent one.

The round number won. Frawley's carve-out, the courts that hemmed in the Delaney Clause, the 1996 law that finally repealed it for pesticides and put a calculable "reasonable certainty of no harm" in its place — the threshold beat the absolute, across food and water alike. And it won even at the one place the absolute was right: the genotoxic carcinogen, the substance that, exactly as Delaney's premise held, has no safe dose to give a number to. These essays are the history of that number — where it came from, who set it, and what it stood in for.