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United States
Environmental Protection
Agency

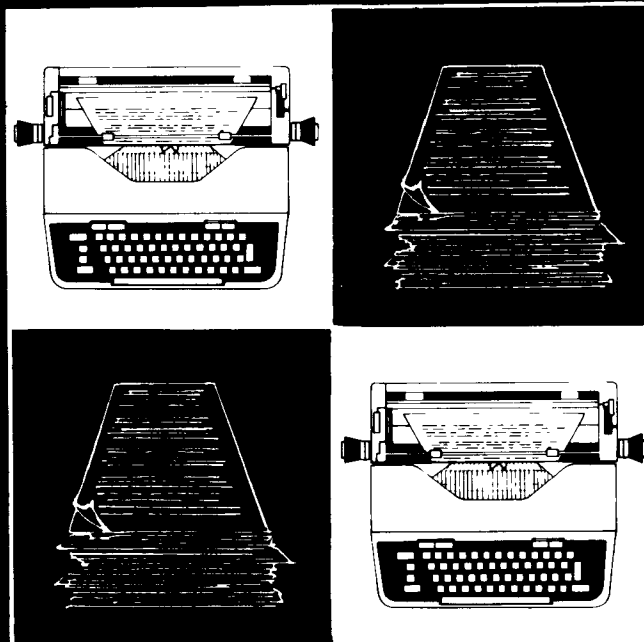
401 M Street, SW
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March, 1980



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Be a Better Writer

A Manual for EPA Employees



FRYE

Be a Better Writer

**United States
Environmental Protection Agency
March 1980**

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FOREWORD

If there is one thing I have learned during my government service, it is the importance of good writing. Writing effectively is crucial to our effort to serve the public and to protect the environment. It is essential if we are to be fair and reasonable with those we regulate. It is the best way to improve communication among different parts of our own organization.

"Be a Better Writer" is a major step toward meeting the President's and our own goals for better communication. It contains example after example of EPA writing. I think you will find it a practical guide for breaking bad habits and developing new writing skills.

I urge you to read this book and refer to it often. You will learn a worthwhile approach; your readers will thank you.

A handwritten signature in black ink, appearing to read "Douglas Costle". The signature is fluid and cursive, with a large initial "D" and "C".

Douglas Costle

PREFACE

The President of the United States has told Government writers to pay attention to their writing. In March, 1978, he issued Executive Order 12044, directed at improving Government regulations:

As President of the United States of America, I direct each Executive Agency to adopt procedures to improve existing and future regulations. . .

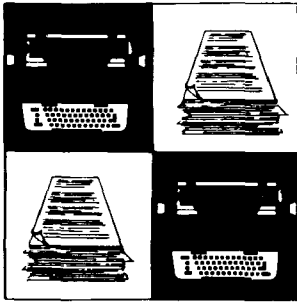
Regulations should be as simple and clear as possible. . .

The head of each agency or the designated official with statutory responsibility. . . should determine that. . . the regulation is written in plain English and is understandable to those who must comply with it.

President Carter stressed plain English for regulations, but we hope that this manual will help to make all Agency writing—memos, reports, even letters—clearer and more understandable.

There are many style manuals on the market: for newspaper reporters, short story writers, academic writers, and on and on. There is nothing, however, for as special an audience as the people who work for the United States Environmental Protection Agency. This manual addresses the problems here at the Agency.

John R. Adams, Ph. D.
Veda Charrow, Ph. D.
Frank B. Phillippi



BE A BETTER WRITER

Most people at the Environmental Protection Agency do not clean up the environment with rakes, or scrubbers, or settling ponds. They use words. Almost everything you write—a research paper, an internal memorandum, a response to a Congressional inquiry, a budget submission, and most certainly a regulation—in some way contributes to fighting pollution.

But the very words we use can become polluted. The Agency has only a few specialists to deal with “word pollution”; often, the people who write for the Agency must also clean up the writing. This manual is dedicated to helping you with this job.

WHY BE A BETTER WRITER?

Government writers have a terrible reputation. Now that members of the public are increasingly more involved in the workings of government, they are finding too many examples of writing they cannot understand. Societies of plain-talking critics have sprung up; the newspapers gleefully report examples of incomprehensible prose.

Members of the public typically have four objections to government writing: it is disorganized, it is anonymous, it is full of jargon, and it is unpolished. Those four objections lead to one conclusion: Government writing is often ineffective.

EPA writing runs the risk of being lumped together with the excesses of our colleagues in other parts of the Government. The way to avoid that risk is, of course, for everyone at the Agency to become a better writer; that is why we have written this manual.

HOW TO START

If we had only one instruction for EPA writers, we would say **Be Personal**. You can avoid the criticisms of government writing through such simple changes as being aware of your audience and adjusting your style to different readers: people outside the government, people outside your specialty, or people within your own office.

Being personal leads to four other principles, which appear here as separate chapters. The first is a reminder to organize your material with your reader in mind. The next principle, **Be Clear**, examines ways to help your reader follow what you have written without being distracted. **Be Tasteful** includes further guidelines to keep the form of what you say from intruding on the function of your message. Finally, in the last chapter are guidelines on **Being Careful** and polishing what you wrote. An appendix gives helpful sources for further reading.

All the chapters start with general statements of policy toward writing. But the chapters do not stop with broad guidelines. Each one offers ways to pull yourself outside what you have written and to concentrate on things you can recognize independently, even though you wrote them yourself. Appearing in most of the chapters, for example, are two types of constructions: the passive voice, which many cite as the primary villain in government writing, and derivative nouns (usually verbs with suffixes, like *preparation* instead of *prepare*). Recognizing these two constructions is half the battle; the other half is testing them—considering the alternative—to see if there is a more effective way to say the same thing.

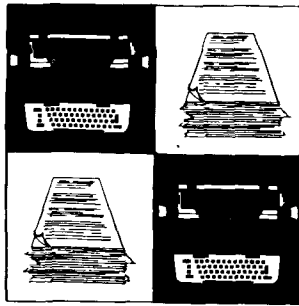
Another suggestion is to work through your writing more than once. The suggestion applies especially to organizing (searching for other ways to present the same facts), to editing, and to proofreading.

That second trip through what you have written is crucial. After you have invested your time, your research, your ideas, and your creative energies in those words on paper, you have a personal stake in them. But people do not like to be told that their words look or sound strange, even though that is what an editor must do. Having someone else say, “What does this mean?” or “Who did that?” or even just a raised-eyebrow “Huh?” is part of testing how well your writing does its job. The editor, even if you are the editor, is the first person to start improving what you have written.

WRITING AT EPA

Writing for EPA adds another layer of complexity to this already difficult process. First, you are often drafting statements of policy or compiling information that someone else will sign. You are not free to write what you really feel or interpret something strictly as you see it. Instead, you must take someone else's idea or guidance, merge it with the available data, and articulate it in the way you think your reviewers would like to say it. But the more people you deal with, the more opportunities there are for misunderstanding, miscommunication, and error. You can handle these problems with careful planning, by knowing your audience, and by asking the right questions of the person making the assignment. Supervisors can help with clear, understandable, specific instructions.

Writing is hard work. Group writing is even harder. We hope this manual will help by making you more aware that the Agency's job is to write more clearly for its audience and to be personal; we especially hope that the practical suggestions throughout the manual will help you become a better writer.



BE ORGANIZED

Organize, organize, organize!

These three words are all you need to remember as you start to write. Well-organized material, arranged in a logical order and supplying organizational cues—headings and transitions—lets your readers process the information you give them more quickly and understand it more easily.

Those three words also make up a conceptual flow from first thoughts to first draft: first you should remember to organize, then you should check the flow of what you have organized, and later you should consider other ways to present the material. Each of the stages is important by itself, and we treat each independently in the following sections.

ORGANIZE-1: Do It

The time you invest before writing is a capital investment that will pay dividends later. More specifically, it can help correct a prevalent shortcoming in writing at EPA: pulling rabbits from hats.

Most people can write straight description. They can say how much it cost to do a study, who worked on it, what it dealt with, and how they went about doing it. But those people rarely know how to organize their Findings, Conclusions, or Recommendations. What they typically do is plow through the descriptive part; then in the last page out comes the rabbit. They jumble their conclusions together with everything that crosses their minds, giving no attention to parallelism, balance, or connection with what preceded the list.

That type of organization strains the reader and often does not even support the conclusions.

It also is one reason why some government reports are so long. When you begin to organize, you have a chance to start asking yourself what you will be concluding or recommending and to incorporate the answers throughout your document.

The time you spend in Organize-1 can also help you ask the most important question before you write: So what? What's the point? Why do you need to write the document? Getting that answer clear in your mind is the most profitable exercise you can go through before you begin writing—and continue as you refine your outline.

Organize-1, even though it calls for two practical questions (one about anticipating your conclusions, the other about your point), is still mainly an exhortation to plan before your write. Organize-2 and Organize-3 concentrate more on the mechanics of getting from The Point to paper; they give you specific hints for practicing what we preach, preach, preach!

ORGANIZE-2: HOW TO DO IT

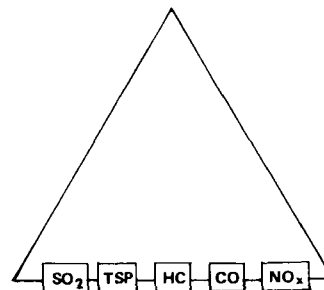
Almost all technical pieces have an Introduction and usually a Conclusion. Those sections put the rest of what you say in context, tell who did what and when, give some background, and, for the Conclusion, reiterate the points you have made along the way.

Writing introductions is just plain hard, and good ones usually come only with practice. One practical improvement is to devote one paragraph to explaining the ORGANIZING PRINCIPLE. Tell your reader what unifies your material and why you have chosen a particular order for it. That paragraph, which alerts your reader to what will come, may be as simple as “We will discuss the following four topics,” or, better, it will say how the topics relate to each other and to your main point. It is essentially a summary of what you did while you organized.

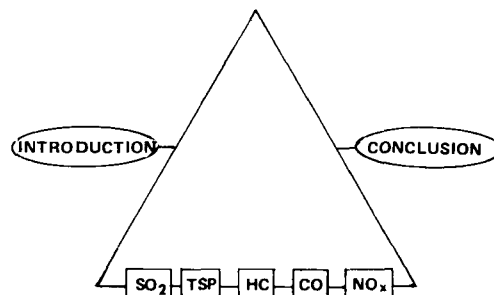
Picture a topic you might be addressing—say, air pollutants. (Imagine that you are writing a preamble to a regulation on air pollution.) Most people have been taught to group their material into categories and then to display it in an outline:

- I. INTRODUCTION
- II. SULFUR DIOXIDE
 - A. Sources
 - B. Problems
 - *
 - *
 - *
 - X. Control
- III. TOTAL SUSPENDED PARTICULATES
 - A. Sources
 - *
 - *
 - *
 - X. Control
 - *
 - *
 - *
- X. CONCLUSION

Now try a different way of looking at the outline, so that the main sections line up along the base of a triangle:

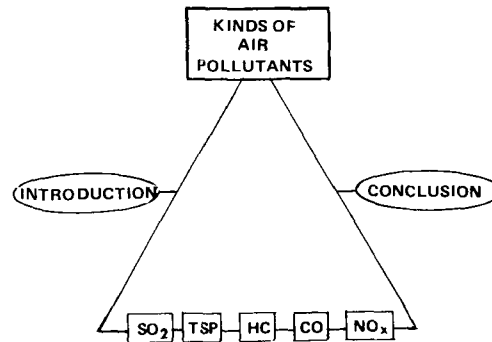


The Introduction and Conclusion can be shoulders for the triangle.



These triangles have the primary advantage of displaying related items (here, pollutants) alongside each other. They also let you see your organization develop; eventually you can suspend further layers of triangles from each of the blocks at the base. The most important advantage of the triangles, however, is that they allow you to ask piercing organizational questions.

What unifies the topics? What do the lower boxes have in common? (In this case, they are all air pollutants, although there are other ways to view them.) Fill that classifier in at the top of the triangle:



Are your topics exhaustive? Are there other air pollutants? You may need to say in your introductory paragraph that other items fit the organizing principle but that you do not intend to discuss them. Occasionally, you might have to revise your organizing principle to narrow it. For example, it might turn out that you are really writing about point-source air pollution, not all kinds of air pollution.

Do they overlap? If your outline contains “TSP” and “Fugitive Dust” as well, something is awry: fugitive dust is itself a Total Suspended Particulate. Be careful not to mix levels of triangles, elevating a subpoint to the status of major points. This mixture of levels would be tempting if you were especially interested in dust (if you were, you should use a different organizing principle).

Are they parallel? The sections of your document should be parallel in two ways. The easier one you can verify when you review your material, checking to

make sure your lists and headings have the same grammatical construction: all gerunds (*Improving EPA's Monitoring*), all infinitives (*To Protect Sensitive Environmental Areas*), all imperatives (*Reorganize the —Office*), all abbreviated sentences (*Resources Inadequate*), all questions (*How Can We Guarantee Compliance?*), or all nouns (*Sulfur Dioxide*).

Your organization should be parallel as well. Something would be wrong if your outline had

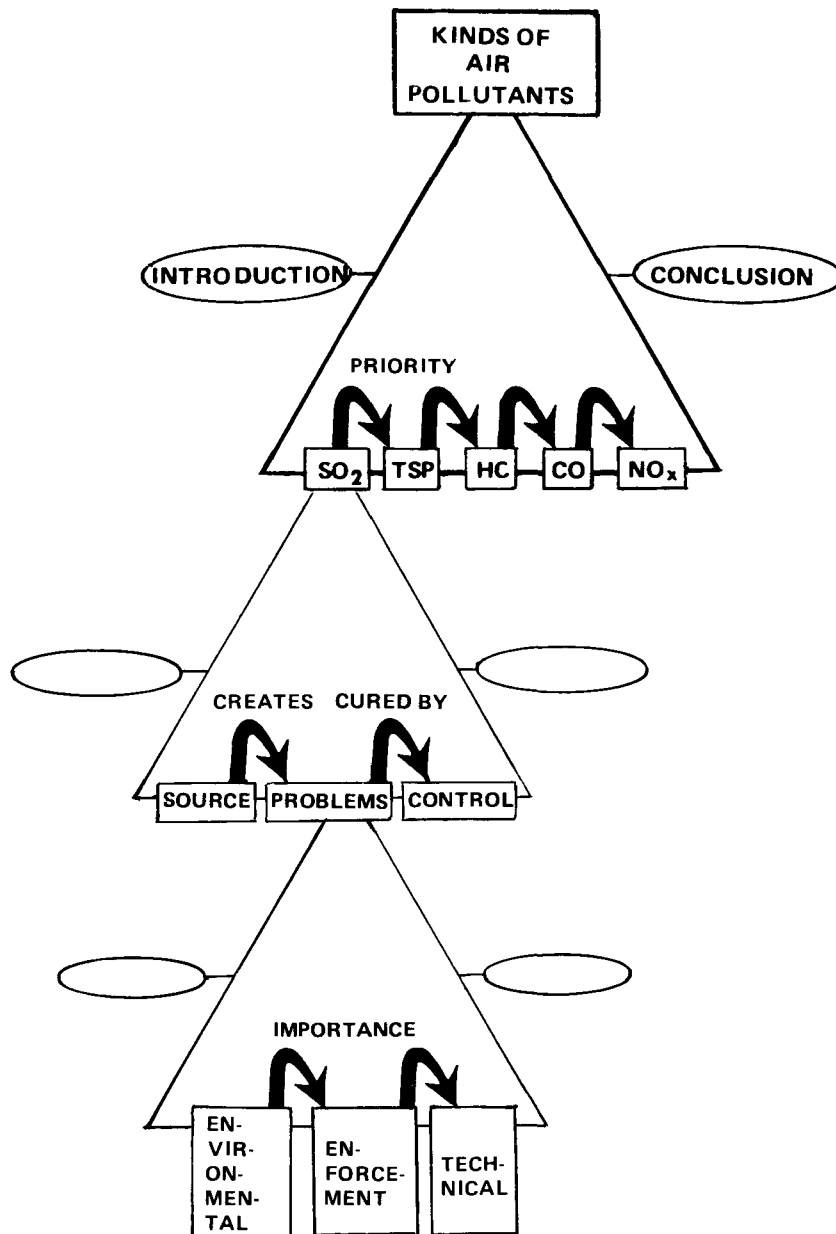
- II. SULFUR DIOXIDE
- III. TOTAL SUSPENDED PARTICULATES
- IV. **MONITORING EQUIPMENT**
- V. NITROGEN OXIDES

Equipment for monitoring may be important, but it simply does not fit with the other items (kinds of air pollutants) in the list. You would have two choices for correcting this lack of parallelism: revise your organizing principle so that monitoring fits, or else remove the topic from the outline, inserting it as a secondary point within some of the topics.

Are your points in the best order? Everything written has a starting point. From that simple fact follows another fact: something really is the starting point, something else follows, and so on. Use your time during Organize-2 to turn these facts to your advantage. Begin by deciding what principle governs the order of a list. (Chapters, headings, conclusions, and even sets of bullets buried deep in your document are all lists.) Next, ask yourself if another principle might be more appropriate. Sample principles include priority, time sequence, location, and cause and effect.

Deciding explicitly on an ordering principle has another advantage: it helps you remember to include transitions, the glue connecting your points. These aids to the reader can be conceptual ("highest priority, next, next") or concrete ("after finishing step 2, begin 3"). Either type is acceptable; the point is to include them.

When you have found the organizing principle at one level (say, chapters), do it again for lower levels. When you finish, you will have made triangles within triangles, all the way to the material in individual paragraphs. The next figure shows a full organization for a report on air pollutants. The annotations—organizing principles, transitions—are notes to yourself on the organizational cues to include.



**ORGANIZE-3:
DO IT AGAIN**

Anything can be reorganized. So try it. choose a different organizing principle and different arrangements within your triangles. Then decide what option will let you present your information most effectively. No principle will invariably be the best one, what you should search for is the most useful one for your specific purpose. The winner will be the one which answers "So what?" most effectively.

A useful organizing technique, one that often arises only after you have thought through an entire report, is to organize by recommendations. An action memorandum dealing with spills of hazardous substances, for example, used topics connected with the recommendations:

- Integrate Information Systems
- Sponsor Training for State Personnel
- Expand Federal Planning
- Request Additional Funding.

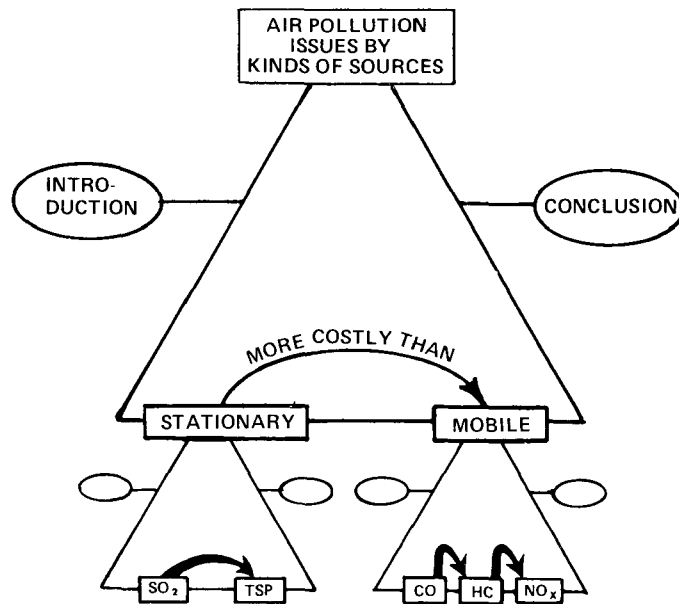
The organizing principle was recommendations; the order was based on priority.

There were several other ways to organize the same material: to use the actors (private sector, States, Federal Government) or to use kinds of spills (classified according to coverage under the Clean Water Act). Organizing around the recommendations forced them into the spotlight and, moreover, was more efficient since it avoided problems with repetition that arose under other organizing principles.

The primary advantage of organizing by recommendations is that it avoids the rabbit-out-of-the-hat syndrome. When you use your recommendations or conclusions as subject headings all along, they will not suddenly pop up as surprises at the end of your document.

Consider again the outline for a preamble on air pollutants. Although something written from that outline would be useful for conveying information about specific pollutants, and it might describe how you gathered that information, it would not be a success if your job were to identify issues in air pollution.

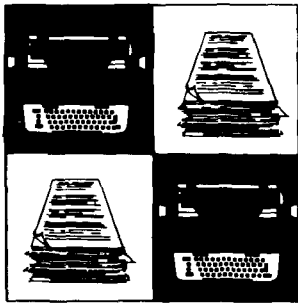
For example, it might turn out that Sulfur Dioxide and Total Suspended Particulates primarily raise issues connected with stationary sources, while Hydrocarbons and Nitrogen Oxides are related to mobile sources. (Or, again, that Total Suspended Particulates, Sulfur Dioxide, and Carbon Monoxide are improving, while Nitrogen Oxides and Hydrocarbons are the same or worse. Or . . .) Then test. (Ask "So what?" Is there something that does not fall



under your organizational umbrella? Are your lists in coherent order?) Your outline might look like the next figure.

There are many ways to outline, and many outlines could be right for a given application. With practice, you will be able to choose (during Organize-2 and Organize-3) the outline that helps you present your information most effectively. But never forget Organize-1: the first improvement you can bring to your writing is to organize and to ask those crucial questions, "So what?" and "What's the point?"

In brief: Organize, organize, organize!



BE CLEAR

Writers of technical or legal material frequently know their subject so well that they fall into a trap: because they and their colleagues understand what they have written, they think everyone else can. Not so. The safest assumption you can make when writing a regulation, a preamble, a memo, or even a routing slip is that your readers are ignorant and, given half a chance, will misunderstand or misinterpret everything you write. Your audience is not really ignorant, of course, but it is unfair to assume that they have spent as much time on your topic as you have.

Obviously, to keep from misleading your readers you must have empathy—something you don't learn from books. You can achieve part of that empathy if you start defining unfamiliar terms and checking to make sure that you have defined acronyms the first time they appear. Another part of the empathy will come if you use clear constructions: if you say what you mean so clearly that your reader can understand it the first time.

To be more specific, in the next sections we take up three easily recognizable but often criticized constructions that can make writing hard to follow. In particular, Being Clear means using the active voice, and not the passive; writing with more verbs and fewer nouns; and using “little” words, which serve as road signs to keep people from getting lost.

USE THE ACTIVE VOICE

Sentences like the following are prevalent in EPA writing:

- (1) Credit was given to the company for installing a pretreatment plant.

Whoever wrote the sentence probably gave the credit (or at least knew who did), but did the person who

read the sentence know? That example is in the passive voice, which, when misused, interferes with clarity by allowing writers to avoid saying who did what. Compare active-voice versions of the same sentence:

(2) I gave the company credit for installing a pre-treatment plant.

or

(3) This office gave the company credit for installing a pretreatment plant.

(Naturally, several other sentences could work, depending on who actually had given the credit.)

Restoring who did what is not the only reason for substituting active sentences for passive ones. For example, which of the following two sentences is clearer?

(4) Resolution of the problem was accomplished during a 6-month study.

(5) We resolved the problem during a 6-month study

In this case, the change from passive to active restores the actor (*we*); it also avoids clumsy circumlocutions like *resolution was accomplished*.

The method for changing passive sentences into active ones works as follows. Take a typical passive sentence:

(6) Regulations on this topic will be proposed by EPA over the next six months.

Three parts of the sentence confirm that it is in the passive voice. First, there is an *-ed* word, technically called a past participle*; here, the word is *proposed*. The second mark of the passive is a form of the verb *be* (in the example, *will be*). The third mark is a *by* phrase containing the agent in the sentence; EPA is the “proposer” in the example.

Passive sentences can be in any tense, including the past tense. All of the following examples are in the passive voice:

*Not all past participles end in *-ed*. *Seen*, *done*, and *given* are all past participles.

Regulations **were** proposed by EPA
Regulations **have been** proposed by EPA
Regulations **are being** proposed by EPA.

All three features (*-ed* verb, form of *be*, *by* phrase) need not be present for a group of words to be in the passive voice. The following example is still in the passive voice, even though it is missing the *by* phrase:

(7) Regulations on this topic **will be proposed** in six months.

Passive constructions can even appear without the form of *be*. These constructions, technically called “phrases,” still have the effect of a passive. The next sentence, for example, has a passive phrase with only the first mark (the *-ed* verb), and no form of *be* or *by* phrase:

(8) Regulations proposed before 1979 will help the Agency avoid litigation.

All of these examples, even those without the actor in the sentence, are grammatical and may, on occasion, be an appropriate choice. Nevertheless, you can easily make them clearer and more direct by putting them in the active voice. First, supply the actor if it is missing; if you or your group did something, say it. You then have a full passive, with the actor present, instead of a truncated one.

Creating the active version from the full passive is straightforward. Start the new sentence with what followed the *by*; change the verb to its active form; and insert the passive’s subject as the active’s object. So, from

The regulations will be proposed during the next six months

first supply the *by* phrase, using your own knowledge of who did what:

The regulations will be proposed **by EPA** during the next six months

and then create an active version:

EPA will propose the regulations during the next six months.

Look through a typical government regulation or other document some time. See how frequently you will not be able to tell who should be doing what. Note also that the style is boring because virtually every sentence is in the passive voice. The techniques from this section are one practical way to keep your writing from being obscure and boring.

WRITE WITH MORE VERBS

Almost every style manual in print nowadays has a list of overworked words: words to avoid. A typical list looks like this:

DO NOT SAY THIS

give consideration to
was in attendance at
make provision for

SAY THIS

consider
attended
provide for

The lists have something in common. Most of the offending words (*consideration, attendance, provision*) are nouns with a verb inside them (*consider, attend, provide*). Those nouns, usually made up of a verb or adjective with a suffix (*-tion, -ance, -al, -ment, -ness*), are technically called “nominals.”

For some reason the languages of science and commerce gravitate toward a noun-filled style, substituting nouns like those in the list for constructions containing verbs. That kind of excess is common in Government English as well. Most style manuals respond to that tendency with a section advising writers to use action words; that is, they recommend using verbs in place of constructions containing nominals.

Aside from increasing the number of syllables, which already makes written material hard to read, the nominals can confuse your readers, just as many passive constructions can. If you had to ask who did the proposing in this example of the passive voice,

Regulations will be proposed within two weeks,

you certainly would ask the same question of

Regulation proposal will take place within two weeks

Inserting who did what helps a little:

Regulation proposal **by this office** will take place within two weeks

But a better solution gets rid of the nominal (*proposal*) entirely, in favor of the verb *propose*.

This office will propose the regulations within two weeks

In general, three kinds of constructions are easier to understand than nominals like *proposal* or *preparation*: a full sentence; a phrase containing the *-ing* form of the verb, called a gerund (e.g., *preparing*); or one containing the *to* form, called an infinitive (*to prepare*). Not every option is available every time, but your ear will let you decide which is appropriate. Thus, in place of

This office started regulation **preparation** on May 17
consider

This office started **preparing** the regulation on May 17
(gerund)

or

This office started **to prepare** the regulation on May 17
(infinitive).

Similarly, in place of the following example,

Prior to the preparation of the new forms,
substitute a more straightforward beginning word and
write a full sentence form (technically called a clause),
inserting who does what as you go:

Before you prepare the new forms
or use the *-ing* form:

Before preparing the new forms

These substitutions are surprisingly easy after you commit yourself to reducing the number of nominals in your writing. The result? More chances to say who did what, fewer syllables in a smoother style, and fewer chances for people to misunderstand what you wrote.

USE “LITTLE WORDS”

At some point in your training, someone may have told you to be concise: to pare down the verbiage, to chop out whole phrases, to remove the flotsam of useless words. Such an admonition is correct, but anyone who follows it slavishly is likely to end up writing information-bearing cargo that cannot be unloaded.

The pitfall in counting words to determine whether your writing is clear and concise is that there are two kinds of words in English: the “big” words that carry your meaning and the “little” words that stick it together so that people can understand what you wrote. Cutting out unnecessary big words is fine; eliminating too many of the little words that hold the content together only makes your writing harder to follow.

The big, content-filled words are the nouns, verbs, adjectives, and adverbs of the language. The little words—the articles, conjunctions, and prepositions – fill in the spaces between the big words.

The spurious conciseness that comes from omitting little words can interfere most when writers string nominals together without any little words to help people group the parts together. These sequences, also called “noun sandwiches” or “mountains of modifiers,” yield such insurmountable phrases as

Inferior product labeling requirements

Agency management planning system enhancements

Surface water quality protection procedures
development.

Strings like these have several drawbacks, among them a stultifying rhythm. The most telling objection, however, is that people have considerable difficulty decoding them—figuring out what words should be grouped together as units. Does the first example mean

Inferior **requirements** for labeling products

or

Requirements for labeling inferior **products**?

Nobody could tell when the example consisted of four big words; but the ambiguity disappears as soon as the little word (*for*) appears. Similarly,

Enhancements to the Agency's system of management planning

and

Development of procedures to protect the quality of surface water

add to the total number of words in the other two examples but are just as concise and are substantially clearer.

The little words can also come to the rescue when you must write *if...then* or *unless* sentences with conjoined phrases inside them. English has no device as clear as the parentheses from mathematics, which make *A or B and C* turn into

(A or B) and C

or

A or (B and C).

Here is an example:

Who must comply with the reporting requirements? If a firm has more than 100 employees or has subsidiaries in more than one State and exports its products outside the United States, then it must comply with the reporting requirements under Section 302.

Chewy prose, isn't it? It is also in the ambiguous *A or B and C* form, without grouping. Read on to find three practical suggestions for coping with examples like that.

The first suggestion is to use lists:

If a firm **(1)** has more than 100 employees or has subsidiaries in more than one State and **(2)** exports its products outside the United States, then it must comply with the reporting requirements under Section 302

The grouping is now unambiguously *(A or B) and C*.

You can also separate the parts of the list using indented paragraphs. Suppose the example meant the following:

If a firm has more than 100 employees or -

- has subsidiaries in more than one State and
- exports its products outside the United States,

then it must comply with the reporting requirements under Section 302.

Now the grouping is *A or (B and C)*. Either style makes the grouping clearer.

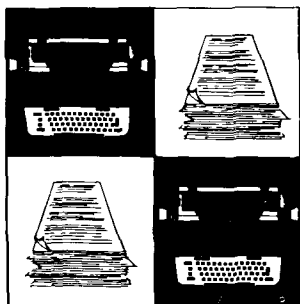
A third device, which doesn't get in the way as much as peppering your writing with numbers or bullets, is to repeat little words. Another way to write the example is as follows:

If a firm has more than 100 employees or **if** it has subsidiaries in more than one State and exports its products outside the United States, then it must comply with the reporting requirements under Section 302.

The one extra word (the second *if*) immediately makes the grouping *A or (B and C)*. Moving the second *if* down near the *and*, in the following,

If a firm has more than 100 employees or has subsidiaries in more than one State and **if** it exports its products outside the United States, then it must comply with the reporting requirements under Section 302.

makes the grouping unambiguously *(A or B) and C*. All those changes in meaning by moving one little word!



BE TASTEFUL

Lurking in the bushes, waiting to take potshots at Government writing, are the self-appointed Guardians of the Public Tongue. The Guardians consider obscure, jargon-laden, or ungrammatical writing a breach of good taste.

The way to deal with those guardians and the pressures they create is to Be Tasteful: to write grammatically and unobtrusively. Three sections in this chapter should help make you aware of these matters of taste. The first applies to choosing neutral gender forms. The second discusses three traditional rules of grammar—rules that, although some grammarians would say they are not valid, you should observe anyway instead of letting people think you had never heard of them. The third section brings in the ever-present problem of how to avoid jargon.

CONUNDRUMS OF GENDER

A conundrum is a problem that has no satisfactory solution. That's what people face when they must select gender-marked forms.

Everyone is aware of the problems that arise with examples like these:

(1) As Chairman (Chairwoman? Chairperson? Chair? Head Representative?) of the Task Force, I believe. . . .

(2) Every Regional Administrator should send his (her? his/ her? his-or-her? their?) forms in by June 30.

People choose up sides quickly on what form to use. If your writing strongly identifies you with one side or the other, you may be caught in a crossfire of potshots.

On one side of the argument are those who feel that the English language, through forms like *chairman* in example (1) and *his* in example (2), subtly and ob-

jectionably biases our thinking against women—that masculine gender leads us to think first and perhaps exclusively about people of the masculine sex.

On the other side of the argument are those who believe that the contortions to avoid the problem are worse than the problem itself. They know that incorrect grammar, as in the next example, with its singular subject and plural pronoun *their*, is wrong:

(3) **Each** respondent should send in **their** comments within 30 days.

They believe intrusive punctuation, which creates forms like *s/he* and *his/her*, is unnecessary. They laugh at new formations like *chairperson*, *spokesperson*, and *Congressperson*.

Both sides may have a point. But since people have become embroiled in such a controversy, EPA writers can Be Tasteful by trying not to offend either camp. Here are two guidelines for doing that.

Avoid clearly sex-marked titles. The Guardians of the Public Tongue have probably lost their battle against *chairperson* (and more terms like it will eventually become acceptable). Nevertheless, you should steer clear of most of the other forms whenever you can. For example: many people object to *man years*, and others don't like *person years*. Compromise and use *work years*. Similarly, instead of the difficult new form *spokesperson* choose the equally neutral form *representative*, *speaker*, or *head representative*. In case of doubt, however, use the new coinage (*-person*) instead of the sex-marked form, provided you have considered the alternative and have tried to avoid a confrontation.

Rewrite to avoid the problem. For example (2), which is especially interesting since EPA has female Regional Administrators, choosing *his or her* over *his* or *their*

(2a) **Each** Regional Administrator should send **his or her** forms in by June 30

is acceptable, but not the best choice. Compare what happens if all the forms are plural:

(2b) The Regional Administrators should send **their** forms in by June 30.

Both examples mean the same thing. Example (2b) is better because the issue of choosing a lengthy form or a sex-marked form does not come up.

Careful, though. You can change your meaning by indiscriminately substituting plurals for singulars. Example (4a) doesn't mean the same as example (4b):

(4a) Each Regional Administrator will deliver his or her conclusions at the meeting.

(4b) The Regional Administrators will deliver their conclusions at the meeting.

Example (4a) means only one thing, but (4b) is ambiguous: will they deliver their conclusions as a group or will they speak separately?

HOBGOBLINS OF STYLE

The Guardians of the Public Tongue are sometimes trigger happy. Some of the old rules—call them “hobgoblins”—are really not so hard and fast as the Guardians would like them to be. Usage changes over time. Good writers know that rules have exceptions and that they sometimes must break one. Tasteful writers break rules only after they have considered the alternative.

As Government writers, how should you approach the examples of changing language discussed in the rest of this section? Try to adhere to the rules anyway, not solely for the sake of obeying them but because you jar your readers, and distract them from your message, when you break the rules.

To Split or Not to Split?

The split infinitive is a fine example of a hobgoblin of style. Some people think this example,

(5) We would lose our ability to flexibly respond to unique situations,

in which *flexibly* splits the infinitive *to respond*, is a mistake.

Of course, moderation is the soul of Being Tasteful. Even the Guardians would say example (5) is a moderate violation of no splitting, but example (6), in which four words split *to respond*, is a flagrant violation:

(6) The law requires EPA to adequately, completely, and legally respond to the guidelines.

(Why not *to respond adequately*. . . *legally*?) Example (6) not only stirs up the hobgoblins, but also makes it harder for the reader to figure out what EPA needs to do—namely, to respond.

The tasteful solution is to split an infinitive only after you have considered the alternative. The choice, barring a complete rewrite, involves moving the splitting words. The adverb (*flexibly*, in *to flexibly respond*) usually will fit comfortably toward the right, after the infinitive. Thus, instead of *to flexibly respond*, choose (7) or (8):

(7) We would lose our ability **to respond flexibly** to unique situations.

(8) We would lose our ability **to respond** to unique situations **flexibly**.

(Either one is fine; the first may be better because it emphasizes *flexibly* a little more.)

Stay sensitive to the split infinitive. The minimal amount of word-juggling necessary to avoid splitting is surely less of a penalty than having your readers start wondering about extraneous matters such as whether you have split an infinitive.

About What to Write?

Another frightening hobgoblin springs forth if you end with a preposition; that is, if you write

The laws which we wrote you about
instead of

The laws about which we wrote you.

The first example ends with one of those short words normally called prepositions.

Once again, it is easier to accommodate the Guardians and avoid distracting clauses that end with *at*, *about*, *of*, *in*, and so on. Sometimes, however, you can't avoid it. There is no convenient way to avoid ending with *of* in this example:

Each year the city produces five million tons of waste which it must dispose **of**.

The usual solution, moving the little word into the sentence (in front of the word *which*), is not even English for that example:

Each year the city produces five million tons of waste **of which** it must dispose

and another choice we have seen is much more jarring than ending with the proposition:

Each year the city produces five million tons of waste which it must dispose.

In other words, ending with a preposition is sometimes the only choice. But consider the alternative: if you can just as easily avoid it, do.

The Media Is (Are) the Message?

At EPA, when you do budgets, work with numbers, and make decisions, you run the risk of offending the Guardians of the Public Tongue. They, having studied Latin, Greek, or traditional English grammar, learned their declensions well:

One medium, two media.
One datum, two data
One criterion, two criteria.

These unfamiliar plurals confuse a surprising number of people, yielding illiteracies like

The first criteria **is** administrability.
The Air Media **has** gained 15 positions.

It also produces discomfoting sentences like

The data **shows** that— —.

You can avoid the fancy word *criterion* either by recasting the sentence with plurals (*The first of the criteria*) or by substituting a synonym like *method of choosing* or *measure*.

The other two are harder to avoid because they appear more frequently as singular words—*media is* and *data is*. *Media*, at EPA, is hardly used except as the “last name” in the budget for *Drinking Water*, *Pesticides*, and *Enforcement*. You can avoid the illiteracy *media is* often by shifting to “first names.” In place of

The Enforcement Media has 42 positions,

see what happens if you drop the word *media* entirely, in a context that makes it clear you're talking about media:

Enforcement has 42 positions.

Datum never appears except in geological surveys, and its plural, *data*, now stands for a clump of numbers instead of a plural collection of individual numbers. In other words, many people at EPA already use *data* as a singular noun. Using it that way, however, exposes your writing to the risk of not Being Tasteful. To use that word as a singular is another way, like breaking rules without reason, to allow your readers to concentrate on how you said something instead of what you said.

The solution, one that appears often in this manual, is to avoid the problem. When tempted to use *data* is, for example, see if *information*, *results*, or *quantities* will work. But if you need *data*, use a plural verb.

TASTELESS JARGON

In a recent memorandum, Deputy Administrator Barbara Blum stated EPA's policy toward jargon:

Our regulations will be written in clear, understandable language, without jargon, bureaucratese, archaic legal phrases, or incorrect grammatical construction.

Hercules had trouble cleaning out the Augean stables (they hadn't been cleaned for 30 years), and you may have trouble eliminating your jargon and bureaucratese. The reason is human nature: one person's necessary technical phrase is another's unintelligible jargon. The cure lies with you. If you keep your audience in mind, much of the pressure to slip into jargon will disappear. Beyond that, try concentrating on two particular causes of jargon in EPA writing: EPA's mixture of specialists and, more generally, the inbred community in Washington.

Borrowing Vogue Words

At any EPA office there are scientists, engineers, lawyers, economists, mathematicians, and administrators. All of these specialists have their own technical vocabularies.

When people use their own technical words correctly and in the proper context, those words are not offensive—they are necessary to communicate accurately.

- MATHEMATICIANS use *parameter*, *factor*, and *optimize* to refer to special concepts.
- COMPUTER SPECIALISTS employ *input*, *interface*, and *data base*.
- ECONOMISTS need *elasticity* and *marginal cost*.
- BUSINESS ADMINISTRATORS use *discount* and *annual basis*.
- SCIENTISTS need *teratogenic* and *mutagenic*.
- LAWYERS need *litigate*, *proximate cause*, and *remand*.
- GRAMMARIANS cannot avoid *gerund*, *infinitive*, and *nominal*.

What happens, though, is that the sublanguages crossbreed, and the resulting hybrid becomes unintelligible to many readers. Spotting words that cross from someone else's special language to the general language is relatively easy. It is harder, of course, to eliminate the special words from your own material when you're writing for an audience outside your specialty.

Probably the worst crossbreeder is legal language. Take three legal favorites: *prior to*, *subsequent to*, and *due to*. Those three phrases create a double problem. First, they make your writing sound like legalese. EPA's regulations and other documents, even with legal concepts in them, do not need to sound that way. Second, they bring in the nominals discussed in "Be Clear." Compare

Prior to our meeting
Subsequent to our discussion
Due to our collection of incorrect data

with

Before we met
After we discussed
Because we collected incorrect data.

Substituting more familiar words (*before*, *after*, *because*) is always an advantage; in addition, the second set of examples now contains verbs (*we met*, *we discussed*, *we collected*), not nouns doing the work of verbs (*our meeting*, *our discussion*, *our collection*).

Another crossbreeder is statutory language. Lawmakers have a long tradition of using *you shall* to mean *you must*. People who speak plain English, however, can misinterpret the strange-sounding

sentences built around *shall*. The following sentence, for example, is ambiguous:

The Administrator shall publish the regulation on August 15, 1981

Transport yourself to the future—to August 16, 1981, one day after the Administrator shall have published the regulation. Suppose the regulation did not get published. Would you say (a) or (b)?

- (a) The Administrator violated the law.
- (b) The prediction about publication did not come true

The word *shall* has two meanings, a *shall* of obligation, the meaning in example (a), or the *shall* of prediction, meaning (b). The courts have voided laws because the writers had let both meanings for *shall* creep into the legislation.

Fortunately, plain English speakers have two words that express the meaning of the ambiguous *shall*. For the *shall* of obligation, they use *must*; for the *shall* of prediction, they use *will*.

The solution to the ambiguity, then, is simple. Never use *shall*, even in regulations and even if the law that the regulation represents uses it. Decide what you mean when you use *shall*, then substitute one of the two plain English words, *must* (when someone is obligated to do something) or *will* (when you predict something will happen).

Inbreeding Our Own Jargon

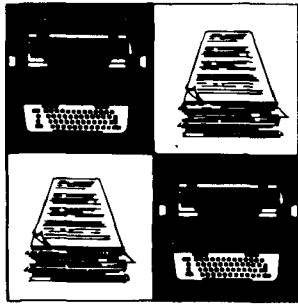
People who work together develop their own language. New words catch on, are repeated, and spread almost daily. Those who use them understand the words perfectly well even if the words are difficult. No one would ever complain about complicated words for complicated concepts, but complicated words used with no reason are not tasteful.

What members of the public find offensive are overused, pet government words. Using the same words in every paragraph—especially words that do not refer to technical concepts—dilutes their effect.

Several people went through Zero-Based Dislike Analysis to come up with the following brief list of pet words, arranged by the intensity of dislike. The list is a sample of the words and phrases that people at EPA are overusing:

- **To impact on.** A barbarism. Even *an impact* is used too often, diluting a few good uses. *Impact* often hides ignorance of the distinction between *to affect* (to influence) and *an effect* (a result). *Impacted* makes some people worry about wisdom teeth; substitute *affected* or *harmed*.
- **Prioritize.** An etymological horror. Replace with *assign priorities to* or *rank by priority*. Its cousin, *finalize* (replace with *make final*, *complete*, or *finish*) also belongs here. People cringe when they hear such words.
- **Implement.** Why can't anybody do, carry out, or perform anything? Try to use this hallmark Government word sparingly, reserving it exclusively for contexts in which it has no substitute. Similar comments apply to *necessitate*, *facilitate*, and *accomplish*; all are long words virtually unused outside the Government.

Be wary of fancy words and catchy phrases that only you know how to use. Let the power of your ideas and the clarity of your expression carry the day, not the number of syllables or the number of abstract words you use. To avoid jargon, Be Tasteful.



BE CAREFUL

In the rush to get something down on paper, you may have had to sacrifice clarity and probably elegance to the pressure of time. Therefore you should always reread what you have written after it has cooled. While they are writing, people often say, "What am I going to say next?" or "Sounds rough, but I'll fix it later." When they finish, they should be asking whether they have made their point clearly and tastefully.

To change something you wrote is never a sin; no professional writer expects to sell a first draft. In fact, two more trips through your document are necessary after you have written it: first to edit, then to proofread. The changes you make then are the essence of Being Careful.

TECHNIQUES FOR EDITING YOUR OWN MATERIAL

Editing your own material is difficult: if you wrote it, it's what you wanted to say. But your audience will judge whether you have communicated effectively, not you.

Since medical science has not yet come up with an operation to allow you to put yourself in other people's shoes (at least not while they're still in them), how can you possibly write as if you were there? Two practical principles, which substitute an almost mechanical procedure for the empathy you are seeking, should help. The first is the Concession Theory of Editing, a device for using other people to help you find places where you should make changes. The second is the Red Flag Approach to Editing, which says that there are certain constructions (marked with imaginary red flags) that you should examine in more detail. That approach cannot completely replace writing with your audience paramount in your mind, but looking for passives and multiple-noun constructions is at least a way to begin.

The Concession Theory of Editing

The first principle for Being Careful is broad. Under the Concession Theory of Editing, you change something you have written—concede and rewrite—if it misleads someone. It does no good to swear on a stack of grammar books, or trace an intricate path to the meaning, if someone cannot follow what you have written. Material in draft form is fluid; treat it that way and change it often.

One easy way to apply the Concession Theory is to use it for ambiguous phrases. Writers rarely realize that something they write can mean something else to their audience, because only one of the two meanings stands out for the writer—just not for the reader. Take a simple 4-letter word like *lead*. Is that “leed” or “ledd”? Anyone who wrote a heading like *Lead Recommendation* or phrases like *lead standard* or *lead agency* would have no trouble, but even a knowledgeable reader could go chasing a wild goose if the context did not make them completely clear.

The Government writer’s workhorse, the acronym, can also confuse readers. Civil Service reform, for example, has introduced an Office of Personnel Management, yielding the same OPM as EPA’s Office of Planning and Management. An Office of Railroad Deregulation, if there were one, would yield another ORD to clash with EPA’s own Office of Research and Development.

Changes to clarify an ambiguous word or two are easy, of course. The next step is to extend the concessions to phrases, sentences, and paragraphs. Remember: if you let the reactions of people around you direct you to what you need to change, you can make those changes while the document is still under your control. Certainly that is preferable to having other people, with a different perspective, come along and “clarify” to meet their own preconceptions.

In other words, use the Concession Theory in group writing, when other people are reviewing and questioning your material. Liberally applying the Concession Theory—realizing that there are always other ways to get the point across—will help you to avoid “I’m right, you’re wrong” confrontations. Using the Concession Theory you can say, “Let’s change it to make the point clearer.”

The Red Flag for Passives

Earlier, we said that the passive voice is a prime contributor to an impersonal writing style. The passive voice can also be acceptable, in moderation. The Red

Flag Approach can help you determine whether individual instances of the passive voice are necessary or not.

Here is how the Red Flag approach works for the passive. Look through your material, then follow four steps. Consider the following example:

The study will be completed by this Agency within six months.

Step 1. Find the *-ed* verb (a past participle— here, *completed*).

Step 2. Find what follows the word *by*. (If it's not there, supply it.) In the example, *this Agency* follows *by* and is the actor in the sentence.

Step 3. Recast the sentence in the active voice. There is no need to write anything down yet—this is a mental exercise (and good practice).

This Agency will complete the study within six months.

Step 4. Test whether the sentence is better in the active (often the right choice) or should stay in the passive.

That decision in Step 4, however, is still open to judgment. Three additional questions may help you decide: (1) Are the transitions evident? (2) Is the actor clear? and (3) Is the active sentence balanced?

Are the transitions evident? The beginning of a sentence is often the place for a transition, a phrase that reinforces your organization. Since passive sentences move something that was farther back (the object of an active verb) to the front (subject of a passive verb), they can move transitional phrases toward the front. Suppose you are writing something about the Clean Air Act and have used a quotation from the Act, mentioning energy requirements, as your organizing principle. You spend several paragraphs on other topics. Then, starting your next paragraph, you write

Energy requirements were included in the model the five agencies in the Task Force on Energy will use to project the effects of the new standards

Try the test: (1) red flag at *included*; (2) no *by*, but probably the five agencies, etc., included the requirements; (3) consider the alternative:

The five agencies in the Task Force on Energy included energy requirements in the model they will use to project the effects of the new standards.

Here the balance may tip toward the passive, because using it causes the paragraph to begin with a transitional phrase (*Energy requirements*), picking up the language in your organizing paragraph. In this example, placement of transitions may take precedence over the normal tendency to put more sentences in the active voice.

Is the actor clear? Every time a Red Flag pops up in connection with a passive, a second flag should pop up when you search for the *by* phrase and can't find one. Ask yourself what phrase you should add to complete the sentence. On a few occasions, the actor is (a) totally redundant, (b) refers to everyone, or (c) refers to people you cannot name. For example:

- (a) The Task Force report was prepared during the last two weeks.
- (b) It is generally accepted that aerobic digestion is less sensitive to upsets than anaerobic digestion.
- (c) The samples were washed, then titrated at pH 3.

Example (a) is acceptable as a passive if the Task Force really prepared the report. The example is misleading, however, if a contractor had prepared the report—and the passive is back at work hiding who did what. In example (b), the sentence says (as the word *generally* hints) that everyone accepts a fact about aerobic digestion. These general statements are acceptable without an actor. In example (c), your answer to “Who did it?” should be “Who cares?” In restricted cases like this example, when you're sure that nobody cares, the passive is again acceptable.

Is the active sentence balanced? Sometimes, after you have reconstructed the active sentence corresponding to the passive you wrote originally, you will find that you prefer the passive because it simply sounds better. Fine. You've considered the alternative, and that is the point of the Red Flag Approach.

The Red Flag for Noun Sandwiches

Some nominals are a necessary evil in most writing on technical subjects. How could EPA people write without

resource **recovery**,
effluent **limitations**,
land **use planning**,
waste **treatment**?

But when you find nominals and other words stacked up—sandwiched together—more than two deep, it is time for caution. Take an example:

Direct product design regulations,

in this case, four words stacked up without any little words to help group them together. Recast the phrase, supplying *for*, *the*, and *of*:

Direct regulations for the design of products.

(You thought they were regulations for designing direct products? Your reader might for a moment.) Or, better, use an *-ing* form for one of the nominals,

Direct regulations for designing products.

Then ask yourself whether the original or either of the two options sounds best and is the easiest for your reader to understand.

Try the following rule of thumb for unpacking these constructions:

Unpack 3-word noun sandwiches for the first few references, then allow them to stand together.
Always unpack 4-word sandwiches.

After all, who ever heard of a sandwich that went bread-meat-bread-meat?

The reason for the rule of thumb is familiarity. As people work with complex concepts, they begin to use larger and larger chunks of words to describe them. They pronounce those chunks easily and understand them well; the words often turn into acronyms. When you have reached the stage when you process 4-word sandwiches comfortably, however, you have lost the public. They must superimpose emphasis and grouping on the long phrase, and that takes time and increases frustration. Give your readers a break.

HINTS FOR PROOFREADING

Proofreading is an art. Most material, thank goodness, never needs the exacting, meticulous review that professional proofreaders can provide. But it never hurts to know some tricks because random typos can be embarrassing (“Container deposits are more than the public can beer”) or downright offensive (“Due to employee suckness, the plant is closed”).

Here are five practical suggestions to help in proofreading. They apply to you and to your typist.

1. Go to the dictionary often. Never be ashamed to go to the dictionary. If a word looks strange, check it. Try this rule of thumb: if you really needed to consult the dictionary in only 20 percent of the cases when you actually did, you are using it appropriately. Put another way: don’t be frustrated if 80 percent of the trips to the dictionary apparently were not necessary. They were.

2. Sound out long words. Long words are tricky: if they start right and end right, we skip over what is in the middle. To counteract that tendency, sound out all the vowels; for example, make *fluoride* come out as flew-oh-ride.

3. Reread lines containing an error. It is human nature to pounce on mistakes, it is also human nature to make two mistakes close together. Rereading lines containing errors helps break these all-too-human tendencies.

4. Read backwards to break content. Use this technique for solo proofreading, when the material must be exceptionally error free. Read the material once from top to bottom (this is useful for catching singular subjects with plural verbs and for spotting dropped “minor” words like *not*). Then grit your teeth and read backwards. You will not understand what you are reading, but you will be sure the words are spelled right.

5. Have two people read to each other. This is the best method, especially if the one who worked from the draft copy now reads the typescript.



APPENDIX

OTHER RESOURCES



This manual does not need to be your only resource for becoming a better writer. The books in this appendix can help you with general perspectives toward writing, with choosing the right words, and with punctuation

BOOKS ON WRITING

Everyone should own a copy of the little book, *The Elements of Style* (1), by William Strunk and E.B. White. In concise, drill-sergeant style, the book covers topics like these:

- Use the active voice.
- Put statements in positive form.
- Omit needless words

Strunk was an English teacher at Cornell for years; his paperback (71 pages) is now a best seller.

A good resource for people writing technical material is H.J. Tichy's *Effective Writing for Engineers-Managers-Scientists* (2). Along with several chapters on common faults in writing, Tichy includes chapters on planning, organizing, and outlining.

Another recent entry to the literature on writing is Richard Wydick's *Plain English for Lawyers* (3), which attacks many of the paired phrases formerly considered essential to "lawyer talk": *free and clear*, *true and correct*, *knowingly and intelligently*. The book also has exercises.

BOOKS ON WORD CHOICE

The most thorough and incisive book on writing and style is H.W. Fowler's *A Dictionary of Modern English Usage* (4). Few people can just pick up Fowler, get the answer to a question, and put the book down, it is too interesting. For example, the entry on *cliches* refers to other sections on *hackneyed phrases* and *vogue words*, which cross-reference

popularized technicalities. And on and on.

A book similar to Fowler, but published for American writers, is W. and M. Morris's *Harper Dictionary of Contemporary Usage* (5). The Morrisses asked 136 writers and editors (Shana Alexander, Heywood Hale Broun, Walt Kelly, Herman Wouk, and others) to comment on several controversial points of grammar. For example, using *hopefully* to mean "we hope" instead of "full of hope" received a 24 percent vote when used in writing (76 percent said they would never use it) and produced comments like these:

Slack-jawed, common, sleazy.

I have sworn eternal war on this bastard adverb.

Chalk squeaking on a blackboard is to be preferred to this usage.

The results of the Harper survey also appear in the *American Heritage Dictionary*.

Another writer who gives excellent explanations of why to avoid certain words and constructions is Theodore Bernstein, long the arbiter of style at *The New York Times*. His *Watch Your Language* (6), although written primarily for newspaper writers, is a classic; less well known is *Miss Thistlebottom's Hobgoblins* (7), subtitled "The Careful Writer's Guide to the Taboos, Bugbears and Outmoded Rules of English Usage." Miss Thistlebottom, a true Guardian of the Public Tongue, was Bernstein's imaginary English teacher at P.S. 10.

For light reading on contemporary extravagance in language, try Edwin Newman's *Strictly Speaking* (8) and *A Civil Tongue* (9). Newman, who works for the National Broadcasting Company, has become a highly successful opponent of Government-speak.

MANUALS OF STYLE

Style, in the strict sense, refers to rules for punctuation, capitalization, and spelling. The most convenient resource for the rules is a dictionary. Surprisingly few people know, for example, that dictionaries contain short sections on how to use commas, periods, semicolons, and the like. The Merriam-Webster *New Collegiate Dictionary* (10) contains a 16-page summary at the end of the book. The *American Heritage Dictionary of the English Language* (11) has information on marks of punctuation under headings in the dictionary proper.

The *Government Printing Office Style Manual* (12) is superbly complete on all the rules the Government

has adopted. Together with pages of discussion on marks of punctuation, for example, are rules for forming compounds (it says to spell most compounds with *non* without a hyphen: *nonsignificant*), lists of preferred spellings (*indexes*), and even spellings for all counties in the United States (*Prince Georges, Maryland*).

EPA has a *Correspondence Manual* (13), incorporating much of the GPO Manual as well as specific instructions for memorandums and letters. Almost every branch at Headquarters has a copy. You can get additional copies at the Distribution Center at Headquarters (B-10, East Tower) or by asking the local Directives Officer (Management Division) in the Regions.

The best manual of style to treat book design whether the Preface precedes the Foreword, and so on is the University of Chicago's *Manual of Style* (14).

The *Federal Register* contains rules (1 CFR 21.1 53) on how to number regulations. In its vocabulary, the Code of Federal Regulations has this organization:

Titles	Arabic numerals
Subtitles	Capital letters
Chapters	Roman capitals
Parts	Arabic numerals
Subparts	Capitals

Below Subparts are sections and paragraphs.

Section numbers appear after a decimal point following their Part; Part 15, section 22 would appear as §15.22.

Paragraphs have a special numbering sequence:

- (a)
 - (1)
 - (i)
 - (A)
 - (1)
 - (i)

The Federal Register Office also plans to reissue its own manual of style, covering many of the topics in this manual but in a more abbreviated fashion.

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