



E. I. DU PONT DE NEMOURS & COMPANY
WILMINGTON, DELAWARE 19898

ENGINEERING DEPARTMENT
LOUVIERS BUILDING

CC: R. D. Snee, ESD, L-3160
BCC: D. R. Diggs, C&P, Brandywine
J. H. Pierrard, C&P, Pet Lab
W. F. Wagner
D. W. Marquardt/ASG File

February 15, 1983

Dr. Ralph A. Bradley
325 Hickory Hill Drive
Watkinsville, GA 30677

Dear Dr. Bradley:

I have read with great interest your review for Ethyl Corporation entitled, "A Discussion of Issues and Conclusions on Gasoline Lead Use and Human Blood Lead Levels" and your comments to Mr. Ben F. Fort of Ethyl regarding (i) "Comments on the Du Pont Analysis of the NHANES II Data" by Dr. James L. Pirkle, December 1, 1982, and (ii) "A Statistical Analysis of the NHANES II Data" by ICF Corporation, December 1982. It was very pleasing indeed to read your corroborating viewpoints on the kinds of statistical issues that both Du Pont and Ethyl have repeatedly brought to the attention of the Environmental Protection Agency (EPA), formerly in the matter of the gasoline lead phasedown regulations and presently in the matter of the review of the Air Quality Criteria Document for Lead.

It was noted in your comments to Mr. Fort that you had not seen the Du Pont analysis on the NHANES II data to which the report by Dr. Pirkle was a reply. In actuality the "Analysis" referred to reflects the collective results on NHANES II submitted by Du Pont to EPA on six occasions during the past year. For your information, I am enclosing the two most recent and pertinent submissions to EPA, dated November 12, 1982 and January 31, 1983. These submissions were prepared by Dr. Ronald D. Snee and myself and reflect our comments on statistical issues and interpretations in recent drafts of the Air Quality Criteria Document for Lead. Of particular interest to you are General Comments 3, 5, 6 and 7.

N33852

TEH 0532809

Page 2
February 15, 1983
Dr. Ralph A. Bradley

in the November submission and General Comments 3 and 4 in the January submission. I would also be pleased to send you, if interested, Du Pont's other four submissions, each of which addresses the NHANES II Study in part.

If you have any questions or would like to discuss these matters, I can be reached collect at (302)-366-3540.

Very truly yours,

ENGINEERING SERVICE DIVISION

Charles G. Pfeifer

Charles G. Pfeifer
Senior Statistician
Applied Statistics Group

CGP:mai
Enc

TEH 0532810

DUP050034080