

February 17, 1978

TO: Official Members, Lead Industries Association, Inc.
Members, LIA Environmental Health Committee

FROM: Jerome F. Cole, Sc.D.

SUBJECT: Public Hearing on EPA Proposed National Ambient Air Quality
Standard for Lead

A Public Hearing on the EPA Proposed Ambient Air Quality Standard for Lead (Federal Register December 14, 1977) was held at the EPA headquarters in Washington, D.C. on February 15, 16, 1978. The Hearing was chaired on the first day by Mr. Joseph Padgett, Director of Strategies and Air Standards Division of EPA. Mr. Stan Coerr of the same division chaired the second day of the session. The Hearing was before a panel made up of representatives of EPA, Center for Disease Control, Occupational Safety and Health Administration and the Consumer Products Safety Commission. Those appearing were as follows:

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Mr. Joseph Padgett, Chairman of Hearing, Director, SASD, OAQPS
Mr. David Hawkins, Assistant Administrator for Air and Waste
Management, EPA
Dr. Howard Roberts, Acting Director, Bureau of Foods, Food & Drug
Administration
Mr. Grover Wrenn, Director of Health Standard Programs, Occupational
Safety and Health Administration
Dr. Phil Landrigan, Chronic Diseases Division, Center for Disease
Control, Public Health Service
Dr. Emmett S. Jacobs, Petroleum Additives and Environmental Division,
E.I. DuPont de Nemours & Company
Mr. David Schoenbrod, National Resources Defense Council
Dr. Sergio Piomelli, New York University Medical Center
Dr. Herbert L. Needleman, Boston Children's Hospital.
Mr. Charles Hockenberry, Battery Council International
Mr. Frank McArdle, Commissioner, New York City Department of Environmental
Protection
Maudene Cooper, National Urban League
Mr. Michael L. Sappington, Representing Secondary Lead Smelters Assoc-
iation
Mr. G.M. Ott, Bunker Hill Company
Mr. Kenneth Nelson, ASARCO, Vice President for Environmental Affairs
Dr. Gary Ter Haar, Director, Toxicology & Industrial Hygiene Department,
Ethyl Corporation
Rev. Ernest Gibson, D.C. Committee for Lead Elimination in the District
Mr. Louis Lombardo, Public Interest Campaign

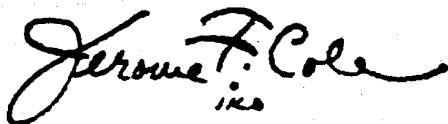
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Dr. Edward McCabe, Lead Industries Association, University of
Wisconsin, School of Medicine
Dr. Julian Chisholm, LIA, Baltimore City Hospital
Dr. James McNeil, LIA, Hillside Medical Center
Mr. Kenneth Wise, LIA, Charles River Associates
Dr. Jerome F. Cole, Lead Industries Association

In general, industry representatives supported a Standard of 5 ug/m^3 whereas representatives of the Center for Disease Control, the National Resources Defense Council, Dr. Sergio Piomelli, Dr. Herbert Needleman and Mr. Louis Lombardo either supported the EPA Proposed Standard of 1.5 ug/m^3 or recommended a more stringent Standard. The representatives of the National Urban League and the D.C. Committee for Lead Elimination in the District stressed the importance of the control of lead in the air without endorsing a specific numerical Standard. Dr. Jerome Cole of Lead Industries Association presented the Association's position and rationale for a 5 ug/m^3 (90 day average) Standard. In addition to the testimony of Dr. Cole, LIA arranged for the testimony of medical experts, Dr. Edward McCabe, Dr. Julian Chisholm and Dr. James McNeil. Also appearing for LIA was the economic consultant, Mr. Kenneth Wise of Charles River Associates. Copies of all the statements presented by LIA witnesses are appended. In addition, statements were obtained from Dr. Ron Panke and Dr. Henrietta Sachs. These are also appended. Basically, it was our position that a 1.5 ug/m^3 Standard is unduly restrictive and that a higher Standard can be justified by using a more appropriate interpretation of the available data. It was also pointed out by Mr. Kenneth Wise that an enforcement of a 1.5 ug/m^3 Standard would result in the closing of many primary smelters and the likely closing of many secondary smelters because of inability to comply to the Standard, particularly in view of relatively high background levels of lead in the air from a variety of sources.

The comment period for submission of written materials to EPA ends on March 17, 1978. LIA will submit detailed written comments in support of its position. It is currently planned that the Standard will be promulgated in June of 1978.

Jerome F. Cole, Sc.D.



cc: ILZRO Lead Environmental Health Committee

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