



Lead Industries Association, Inc.

292 Madison Avenue

New York, N.Y. 10017

Telephone: (212) 578-4750

*file
Unleaded Gasoline*

~~Mr. Rogers~~

October 15, 1984

TO : LIA Environmental Health Committee
LIA Regulatory Activities Committee

FR : Rosalind A. Volpe
Assistant Director, Environmental Health

RE : Comments of the Lead Industries Association on EPA's Proposal to
Reduce the Lead Content of Gasoline to 0.1 Grams per Gallon

Attached are the comments of the Lead Industries Association on EPA's proposal to reduce the lead content of gasoline to 0.1 grams per gallon. The comments were filed on October 1, 1984.

Rosalind Volpe

Rosalind A. Volpe

mfcl
Att.: a/s

Reading LIA's arguments makes me wonder about EPA's intelligence and/or integrity in decision-making. Again, they seem to have established a goal, then dredged up all kinds of reports, interpreting each to "prove" their points. Hopefully LIA's report will have some influence on the outcome. REF



BEFORE THE
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In the Matter of	)	Docket No. EN-84-05
	)	
REGULATION OF FUELS AND FUEL	)	49 Fed. Reg. 31032, et
ADDITIVES, LEAD PHASEDOWN	)	seq. (Aug. 2, 1984)

COMMENTS OF LEAD INDUSTRIES ASSOCIATION, INC.

EDWIN H. SEEGER
KURT E. BLASE
Prather Seeger Doolittle & Farmer
1101 Sixteenth Street, N.W.
Washington, D.C. 20036

Attorneys for
Lead Industries Association,
Inc.

WERNER T. MEYER, President
ROBERT D. PUTNAM
ROSALIND VOLPE
Lead Industries Association,
Inc.
292 Madison Avenue
New York, New York 10017

October 1, 1984



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EXHIBIT B: Oil Change Intervals Cannot Be Doubled By Switching to Unleaded Fuel.	
EXHIBIT C: Comments of Dr. Peter C. Elwood, Chairman, Epidemiology Unit, United Kingdom Medical Research Council, concerning the gas lead/blood lead relationship (January, 1984).	
EXHIBIT D: Testimony of Dr. Edward B. McCabe, Clinical Professor of Pediatrics, University of Wisconsin Medical School (August, 1984).	
EXHIBIT E: Testimony of Dr. Paul B. Hammond, Head, Division of Toxicology and Bio- Environmental Sciences, Department of Environmental Health, University of Cincinnati Medical Center (August, 1984).	
EXHIBIT F: Report of EPA Expert Committee on Pediatric Neurobehavioral Evaluations (November 14, 1983).	
EXHIBIT G: Low Level Lead Effects.	
EXHIBIT H: Legal Memorandum Supporting Comments of Lead Industries Association, Inc.	



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SUMMARY

The Lead Industries Association, Inc. (LIA),^{1/} strongly urges the Environmental Protection Agency to abandon its latest lead phasedown proposal because it will not provide any public health benefits but will cost gasoline consumers and owners of vehicles requiring leaded gasoline billions of dollars.

Though leaded gasoline consumption has been reduced by 70 percent as a result of the rising proportion of cars using unleaded gasoline and EPA's phasedown regulations, there is no reliable evidence of any reduction in the number of lead intoxicated children and considerable evidence that the

^{1/} LIA is a nonprofit trade association whose member companies include nearly all domestic producers and many commercial consumers of lead.



number is not falling. The reason is that lead-based paint in dilapidated housing is the principal cause of elevated blood lead levels in children. EPA's effort to reduce the number of children at risk by limiting the lead content of gasoline has thus been a failure and, worse still, has lulled federal officials into ignoring the real problem -- lead-based paint in old housing.

Despite this history, EPA now proposes to accelerate the lead phasedown program and reduce the lead content of gasoline to 0.1 grams per gallon. Perhaps because it recognizes that the phasedown program has not benefited children with high blood leads, EPA places heavy emphasis on alleged benefits to children with low blood leads.

First, EPA cites recent studies which "suggest possible small effects on IQ and other behavioral disfunctions" (49 Fed. Reg. 31038). This conflicts with the findings of a panel of scientists established by EPA which could find no evidence that "validly established (after proper control for confounding variables) a relationship between low-level Pb exposure and neuropsychologic deficits in children." EPA appears to have rejected the findings of its own panel. Although the panel severely criticized the widely publicized Needleman study on this issue, EPA has apparently accepted a reanalysis of the Needleman data that was not submitted to the panel for review.

