

April 11, 1963

Dr. E. M. Adams
Biochemical Research Laboratory
1701 Building
The Dow Chemical Company
Midland
Michigan

Dear Adams:

I am sending an abstract of my paper on Air Quality Standards to Mr. Arch today, and I enclose a copy of it herewith. I hope to have the manuscript prepared in time to meet your indicated deadline of April 26th. I may not be able to do this because of a series of other deadlines which I must meet, and if I do not succeed, I shall supply the 200 copies to Mr. Arch according to your instructions.

At present writing, it seems unlikely that I shall be able to attend the meeting in Detroit except on Wednesday, as I am due back in Cincinnati that evening for another engagement. In all likelihood, I shall be able to attend the Author's Breakfast Wednesday morning.

As to the "negative aspect" of my talk, and possibly, of my remarks, as well, I think you know me well enough to suspect that what I shall say will be what I have good reason to believe. Being constructive in this and in kindred matters requires taking care to do the right thing on the basis of sound information, rather than lending encouragement to the compulsion "to do something." Meantime, I am not sitting idle, or encouraging anyone else to do so.

Sincerely yours,

Robert A. Kehoe, M. D.

RAK:ss

Enclosure: copy of Abstract

cc: Mr. Arnold Arch

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**Faults, Limitations and Disadvantages in
Air Quality Standards**

by Robert A. Kehoe, M.D.

While there are other significant reasons for concern as to the effects of air pollution in the modern community, the primary and imperative reason for its control within specified limits, is that of the preservation of human health and well-being, to the extent that these are threatened. The ultimate desirability of the development and application of standards for the quality of air breathed by human beings, as we face the future of an increasingly complex technological society, is unquestioned. The best means of so doing, however, are as yet uncertain, and certain limitations and disadvantages which will be singled out are now greatly overshadowed by one fault - our ignorance of the impact of air pollution, in its present form and scope, on man.

This fault poses the great likelihood that any standard which is established at this time will be found later to be incorrect, whether because of our inability to perceive or interpret the operation of the combined factors in the present complex atmospheric environment, or because we cannot anticipate subsequent changes therein. This fault sets limits upon the application of such standards in time and place, thereby creating the serious disadvantages, on technical, legal and administrative grounds, of lack of uniformity in the standards, themselves, in various areas, and of undue

variability in the mode and adequacy of their application. In short, while it is essential that very earnest consideration be given to the matter of standards, and especially to the medical and epidemiological information which must be assembled by laborious and well designed investigations, this is not the time to devise and promulgate such standards except in local situations which may require prompt correction. From such experience with individual and local problems we shall learn how best to proceed on larger fronts.

Certain specific problems will be considered briefly. Reference will be made to the development of methods for the investigation of the impact of atmospheric pollutants on exposed populations and groups.

The question of the legislative approach to air pollution versus that of reliance upon present administrative mechanisms in public health, will be explored on the background of the inter-city, inter-county, inter-state and inter-national spread of air pollution.

A still further point which must be examined thoroughly, and early, in the logistics of the control of air pollution, is that of the further cultivation and implementation of responsibility within industry, individually and collectively, for the development and the application of standards for the disposition of wastes and exhausted materials, comparable to those now being developed and applied as good practice in the control of the environment within

- 3 -

the industrial establishment.

These are problems which must be faced and solved before we can hope to apply air quality standards successfully on a broad base.

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