

January 14, 1942

Dr. Robert Kehoe
Kettering Laboratory
Univ. of Cincinnati
Cincinnati, Ohio

Dear Bob:

I have often promised myself since that delightful Christmas party at the Gatchell's that I was going to visit you in your laboratory again, or at least write.

I now find a specific reason for writing, which makes me only too conscious of my failure to write before and tell you how much I enjoyed meeting your family.

My problem today is as follows:

There is a distinct possibility that the Government in order to conserve supplies of tin may direct the packaging of tooth paste in tin coated lead tubes. Our studies to date have convinced us of the following facts:

1. That the tin coated lead tube as a product of commerce is decidedly imperfect and that there is at least a frequent probability of contact of the paste with lead.
2. That our tooth paste packaged in pure lead tubes does absorb small quantities of lead.
3. To the best of my knowledge there are no governmental regulations with respect to permissible lead content of a dentifrice except as this may be reasoned from the permissible lead content of chalk which is recommended as a dentifrice.
4. The Food, Drug and Cosmetic Act proscribes the use of any package which may render its contents harmful.
5. Apparently the burden of proof would be on the manufacturer of a dentifrice to prove that a lead bearing tube would not make the dentifrice harmful.

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With this background in mind I am quite anxious to have an opinion as to what amount of lead contamination of a tooth paste might reasonably represent a maximum safe lead content.

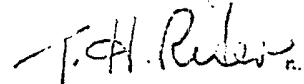
Now that I have outlined our problem I would like to ask if you will advise me as to three things:

- a. Informally, what limit do you think would be tolerable for lead in a dentifrice?
- b. Under what conditions and at what cost would it be possible for us to retain you to develop a report establishing a safe lead tolerance, and if necessary to be a witness in our behalf should we be criticized by virtue of the fact that our dentifrice in the future might contain amounts of lead within the tolerance your report would set up?
- c. What arrangements can we make with you to have your Laboratory formally cooperate with us in determining lead contamination of tooth paste? For instance, would it be possible for you to quote us a price per analysis so that we might feel free to send you a possibly sizeable number of samples for analysis from time to time?

In all probability it would be necessary for me to come to Cincinnati to discuss this matter in detail before it could be finalized, but I shall greatly appreciate any informal opinions which you can give me now and also any estimate of the probable cost of such a formal setup as I have attempted to outline.

Kindest regards to yourself and your family,

Sincerely yours,



T. H. Rider
Technical Director

THR:MG

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