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FROM: D. R. DIGGS
MARKETING MANAGER - ANTIKNOCKS

EPA EXTERNAL REVIEW DRAFT "AIR QUALITY CRITERIA FOR ATMOSPHERIC LEAD"
MEETING OF THE SUBCOMMITTEE OF THE SCIENCE ADVISORY BOARD

On January 31, 1977, the Subcommittee on Scientific Criteria for Environmental Lead of the Executive Committee of the Science Advisory Board of the EPA met in open session in Washington, D. C. The specific charge by EPA to the Subcommittee was "to provide advice and consultation in the review and evaluation of the draft Air Quality Criteria document for atmospheric lead ---". That document was issued in November 1976, as I have previously advised, in response to a Court order requiring EPA to establish an ambient air standard for lead. In the draft EPA suggested that an ambient air standard for lead of 5 $\mu\text{g}/\text{m}^3$ (90 day average) would be protective of public health. Since the draft document was made available for review, environmental groups and others have severely criticized the suggested standard as far too lenient.

At the beginning of the Subcommittee meeting EPA representatives said that a criteria document should not suggest or recommend a standard, but instead lay out all the information on which a standard should be based. Without quite saying so EPA admitted that it should not have mentioned any numerical standard in its draft document. EPA said standard setting should come only after an acceptable criteria document was available, and was the responsibility of the top management of EPA not the authors of the criteria document. This was, I believe, an attempt to head off argument about the standard itself and confine the discussion to the scientific merits of the information in the document. The attempt was not successful.

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The Subcommittee is composed mostly of academics in the fields of medicine, biology and environmental control (list attached). It lost no time in attacking both the document and the suggested standard. The kindest statement made about the document was that it was "inadequate". The Subcommittee was critical in three major areas:

- Not enough attention was directed to the ingestion by children of dust and dirt contaminated by lead fallout from automobile exhaust.
- The significance of populations at special risk from lead - children and pregnant women - was not discussed sufficiently.
- The relationship between airborne lead and blood lead was not adequately developed.

Despite EPA efforts to avoid discussion of its suggested standard, the Subcommittee returned to that subject repeatedly. The major question was why the EPA was now suggesting $5 \mu\text{g}/\text{m}^3$ when it recommended $2 \mu\text{g}/\text{m}^3$ back in 1972 as justification for its first try at promulgating lead phasedown regulations. The Subcommittee felt that all that had been learned since 1972 about lead in the environment indicated more of a problem rather than less, but the EPA had relaxed the suggested standard. EPA's answer, which was in essence that $5 \mu\text{g}$ was the "effect" limit with no safety factor and $2 \mu\text{g}$ did have a safety factor, failed entirely to satisfy the Subcommittee. Members felt the standard should be 1-2 μg .

After hours of discussion the Subcommittee came up with a long list of suggested revisions, additions, omissions, clarifications, etc. which it thought EPA should include in a revised document. The thrust of all these suggestions was to make environmental lead a matter of much greater concern and thus subject to more stringent control than was the case in the draft document.

It remains to be seen how the EPA will react to the Subcommittee criticisms, which are only advisory not binding. EPA is

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working to have the final document ready for internal review by April 1 with publication and setting of the air quality standard done by August of this year. Considering the intense criticism of the 5 ug standard, it may not survive.

As we advised you earlier, we prepared a detailed critique of the draft document and sent it to EPA. Copies have been sent to the Technical Managers. We also provided our critique to the Subcommittee. Because of a tight time schedule, however, the Subcommittee did not have copies in time for its meeting, and it was accordingly not discussed. We will, however, be reviewing our comments with selected members of the Subcommittee and with the appropriate people in EPA as the revision process goes forward.

DRD/pwh
Attachment

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SUBCOMMITTEE ON SCIENTIFIC CRITERIA FOR ENVIRONMENTAL LEAD

January 31, 1977

Participants
(Anticipated)

Chairman

Dr. Roger O. McClellan
Lovelace Foundation

Consultants

Dr. J. Julian Chisolm, Jr.
Baltimore City Hospital

Dr. Paul B. Hammond
University of Cincinnati

Members

Dr. Eula Bingham
University of Cincinnati

Dr. Ruth R. Levine
Boston University

Dr. Samuel S. Epstein
University of Illinois

Dr. Bailus Walker, Jr.
Govt. of the District of Columbia

Dr. Edward F. Ferrand
NYC Department for Air Resources

Dr. Geoffrey S. Watson
Princeton University

Dr. Sheldon K. Friedlander
California Institute of Technology

Ms. Anne M. Wolven
Syntex Corporation

Dr. James G. Horsfall
Conn. Agriculture Experiment Station

SAB Staff Officer

Mr. Ernst Linde
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