January 22, 1968

Herbert E. Stokinger, Ph.D.
Chief, Toxicology Section
Department of Health, Education and Welfare
Occupational Health Research & Training Facility
1014 Broadway
Cincinnati, Ohio 45202

Dear Herb:

I note in the announcement issued by George Clayton of A.I.H.A. that your Committee intends to give further consideration to the establishment of tolerable levels of concentration of both tetraethyllead and tetramethyllead, among a number of other compounds and materials.

In view of the potential importance of the action of the Committee in relation to these two compounds, I would like very much to meet with the Committee and to explain the matter in such detail as their time and interests will permit. If this is not within the pattern of the procedures of the Committee, it would suffice, perhaps, if you and I were to lunch together, or at least to meet, and talk further about this. I find it impossible to understand their reluctance to eliminate the numbers prescribed for these two substances on any other basis than that they do not understand the nature of the situation. The indication in the statement of intent, is that there is a desire to revise the numbers downward. There is no proper basis for so doing, and in addition there is no urgent reason, in relation to the practice of industrial hygiene in this industry as a whole, to supply any number at all.

As I indicated to you, there are several situations in connection with the commercial operations of this world-wide industry, in which the only satisfactory hygienic regimen calls for the rigorous prevention of exposure to these compounds. It has been demonstrated clearly that this can be done, and in fact, has been done. I should be very sorry, indeed, to wake up some day to the recognition of the fact that the industry, as it is represented in the operations concerned with mixing lead antiknock materials with gasoline at gasoline refineries (as one example of the regular procedures involved in the distribution and use of these products) had accepted the dictum of hygienic authorities to the effect that it is unnecessary to take present precautions, since there is a much greater factor of safety than they had been led to believe. Several other situations, especially those associated with the cleaning and repair of gasoline storage tanks, are similarly vulnerable to such changes in viewpoint.

Many years have passed under the present hygienic regimen without recurrence of the illnesses and fatalities that came about before the regimen was developed, nurtured, and complied with. Its vulnerability even then has been demonstrated, when through ignorance or carelessness in out-of-the-way spots in the petroleum

KE 0007415

industry, illnesses and fatalities have occurred in connection with the cleaning of gasoline storage tanks. Otherwise, in those activities in which it has been possible to supervise or fully to indoctrinate the personnel involved, as in manufacturing and intra-refinery mixing operations, there has been no incidence of illness or fatalities, so that only those persons who like myself have lived with the industry for forty years - only a few remain - have anxiety based on experience. There has been a tendency, therefore, which has had to be combatted vigorously, to relax in the assurance that nothing untoward will occur.

I have collected the material for a monograph on this entire subject, which will be oriented toward the development and maintenace of an awareness of the nature of these problems and of the methods (in principle) that must be employed for their control. I do, indeed, hope that we can keep the situation on an even keel in this and other countries, at least until this record can be made available. I feel sure of the purpose and the professional integrity of your Committee, and I would like them to understand fully my viewpoint in this matter and the basic facts behind it.

Sincerely yours,

Robert A. Kehoe, M.D.
Professor Emeritus of
Occupational Medicine

wp

KE 0007416