



STANDARD OIL COMPANY OF CALIFORNIA
WESTERN OPERATIONS, INC.

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October 19, 1961

Mr. John F. Koehnle
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Dear Mr. Koehnle:

You recently asked for our suggestions on what the lead additive industry should be doing regarding the West Coast smog situation, particularly in the light of the October 10 hearing held by the Assembly Subcommittee on Air Pollution and Radiation Protection. You indicated these suggestions might be considered at an October 24 meeting in Detroit, at which future steps will be considered.

Here are our suggestions:

Health Aspects of Lead

1. We suggest you review the transcript of the October 10 hearing and decide what technical facts, if any, regarding the effects of lead on health were not clearly presented or not mentioned under the pressure of questioning. Consider presenting these facts to the Committee. For example, we understand Dr. Kehoe said that Los Angeles air contains two to six times the lead found in the air in other cities; yet the blood lead level is the same in residents of all cities. This resulted in confusion in the minds of the Committee, and should be cleared up, at least with the Committee consultant.
2. As you know, Dr. Goldsmith of the State Health Department stresses that particle size of air borne lead is an important factor in the amount of lead absorbed by the body. Particle size will probably be included in the air standards for lead which the State Board of Health will adopt in the future. It is important, therefore, that the particle size distribution of lead in the atmosphere at street level be known to assure that the lead standards have a scientific basis. Despite the fact that the State Health Department is currently conducting research on particle size of lead in the air, we feel that an

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independent study should be conducted, particularly in view of the fact that advances in instrumentation will permit a better analysis of particle size distribution in the sub-micron range. This project could well be part of a larger research project which is being considered in various quarters to determine particle size of all air pollutants. The Air Pollution Subcommittee of the Medical Advisory Committee of the A.P.I. is supposed to have some type of recommendation for air pollution research to be presented at the coming A.P.I. session in Chicago. Your Mr. Hasselberg is a member of the Air and Water Conservation Committee, which will hear from this Medical Advisory Committee at this meeting. On the other hand, the results of any A.P.I. project along this line may not be available by the time the Health Department needs the factual information upon which to recommend standards.

Effect of Lead on After Burner Catalyst Life

Of course, it is obvious that if a catalyst could be developed that would not be affected by lead, the threatened loss of business by the lead additive industry would be eliminated. As you know, Mr. Griswold has stated to the Board of Supervisors in Los Angeles that lead additives in gasoline shorten catalyst life. In reading his September 19 report, we find on Page 11 that the basis for his statement is "some estimates" on catalyst life. So far as we know, there is no good data that has been published on this subject and we doubt that catalyst manufacturers have conducted the type of definitive study necessary to get real answers in this area. What is needed is some real facts. Several alternatives are apparent.

1. Contact Mr. Griswold and ask him to supply a copy of the data upon which he based his statement.
2. The lead additive industry could contact the same people Griswold did in his visit in the East and upon whose information he apparently based his statement regarding the effect of lead on catalyst life. They could endeavor to find out more detail about reduction of catalyst life, such as any information on the effect of various lead levels in gasoline. At the same time they could explore with catalyst manufacturers the problem of obtaining samples of their catalyst for use in a research program. Considering the complexity of the catalyst picture in regards to patents and secrecy agreements, this may prove to be an undertaking of some magnitude.
3. The lead additive industry could test its own catalysts to determine the effect of various lead levels on life. This could be a program conducted without the knowledge of others and could provide valuable information on proper test procedures and variables that need control.

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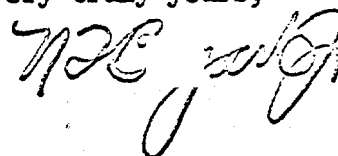
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4. The lead additive industry could offer to cooperate with the Los Angeles APCD and other interested parties in conducting joint tests. It may be that the best path to initiate such a project would be through the Motor Vehicle Pollution Control Board who, in our opinion, should have jurisdiction over this matter of catalyst life, not Griswold. Mr. Griswold, however, would get into the picture because his laboratory has a contract with this Board to do testing of exhaust devices.

Deciding which alternatives should be used and when they should be implemented is obviously important. We suggest that the lead additive industry begin conducting tests on its own, as suggested in Alternative 3. Additionally, the lead additive industry should be prepared, when the timing is appropriate, to urge a joint project on this matter. Alternative 1 might cause Mr. Griswold to take some arbitrary action.

Very truly yours,



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