

October 31, 1945

Mr. C. L. Nisso-Gill,
The Associated Ethyl Company Limited,
Avda. Pte. Poque Saenz Peña, 710,
Buenos Aires, Argentina.

Dear Charlie:

I was very glad to hear from you and to find out how things were going. I am very glad that Dr. Pavlovsky has been made a member of the Committee on regulations. This should be very helpful in getting sensible and workable plans laid down.

In reply to Dr. Pavlovsky's question we have found the following general program of analytical work to be quite satisfactory. In the American manufacturing plants we have made careful selection of a representative group of workmen. We have not carried out analyses on the excretion of all workmen, for the idea has been not so much to check individuals, as to use the observations made as a means of determining the general level of lead exposure in the various occupations of the manufacturing plant. Accordingly we have selected 10 to 20% (never less than 3 or 4 individuals) of the group engaged in any one occupation. These men have been advised what is desired and how to conduct themselves properly, and each has been urged to give his most careful attention to follow out the instructions given him for the collection of samples of feces and urine at stated intervals. The composite group of 40 to 120 workmen (depending upon the total number employed in manufacturing activities) collects samples in accordance with our instructions at intervals of three months. The results are studied carefully from time to time in order to see what is occurring in connection with the several occupations. We have followed this procedure for about fifteen years, and the available information makes it possible for us to predict under a given set of conditions. If the plant in Argentina is built in accordance with the best current methods, we should be able to control all of the hazards to an adequate extent. In this way there should be no difficulty of any kind for a period of years at least. I may say by way of illustration that the British plant was built and the general medical regimen was set up in accordance with our instructions in 1939. By reason of the small number of employees, Dr. Cassells chose to make observations on each individual. Therefore, he has complete data at quarterly intervals on all the employees of this plant. During that period there have been no cases of lead poisoning and there have been no instances of lead absorption beyond safe limits.

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In addition to the analyses referred to above other analyses are made in accordance with current requirements. Thus if any man presents himself for examination, whether in connection with any current illness, or whether he has been involved in an accident or an unusual exposure, samples of blood and urine are taken at that time for analysis. A careful physical examination is made and a conclusion arrived at, which is then subject to confirmation or otherwise on receipt of the analytical results some days later. We also employ this method of sampling and analysis whenever we have occasion to investigate the potential lead exposure of any occupational group from time to time. For example, some time ago we had reason to suspect that the lead exposure of still operators in one of the plants had increased considerably. In order to establish the facts we obtained samples of blood and urine from all of the men engaged in this occupation in the course of a few days, and consequently we were able to interpret the situation promptly. I think I should point out that regulations in connection with this type of work should not be too detailed and specific. There is no point in introducing such details into formal law or official regulations, for this is only a means of obstructing the carrying out of proper work. We can provide complete and detailed information on methods of analysis, necessary equipment and facilities and all such related matters. Experience in this is comprehensive and thus we can make certain that mistakes or procedure will be avoided. The work in the Argentine should be set up on exactly the same basis in principle that it is in the United States. However, there should be room for variations in procedure so as to make the necessary adaptation to the local situation. This type of work is very painstaking, and it is very costly. Therefore, it should be set up on a practical basis in accordance with the magnitude of the hazards involved. Proper judgment as to what should be done and how it should be done cannot be left to government agencies, but is rather a matter of the best judgment of an experienced doctor who is given the responsibility for the safety of the men. I hope, therefore, it will be possible to set up general provisions which will enable us to do this job as it should be done without reference to a large series of troublesome and irrelevant regulations.

In accordance with your request I am forwarding two copies of the report "Occupational Lead Exposure and Lead Poisoning."

Sincerely yours,

Robert A. Kehoe, M. D.

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