

December 16, 1977

P. G. LENSEN
PIGMENTS DEPARTMENT
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EPIDEMIOLOGY STUDY OF LEAD CHROMATE WORKERS

In a letter to G. N. Bruxelles, Chairman of the DCMA Lead Chromate Subcommittee, dated November 22, 1977, I transmitted a request from Dr. Clark Cooper of Equitable Environmental Health for permission by the DCMA for him to publish the results of the Epidemiology Study.

Unfortunately, both you and I were absent from the Lead Chromate Subcommittee meeting that was held on December 8, 1977 in New York. Bruxelles has told me it was moved and passed by the Subcommittee that permission should be given to Cooper for publication. He told me that Harold Fitzpatrick of Cleary, Gottlieb told the Subcommittee this matter should be referred to the DCMA Board of Governors. Bruxelles told me that he had forwarded the motion to the Board of Governors. He added that the motion contained a final sentence stating that the industrial hygiene portion of Equitable Environmental Health report would be excluded from the permission to publish.

I think I was able to convince him of the incompleteness of an epidemiology report which says nothing about a linkage between exposures to the substance which is under examination and the mortality results and analysis thereof. I tried to convince him, also, that the industrial hygiene portion of this report establishes the case that workers have been exposed at or above the present permissible concentration of 0.1 milligrams per cubic meter as CrO_3 , especially in past decades when dust control was not as adequate in the plants as it is today. The fact that even with these adverse exposure conditions the excess of disease cases in the exposed population is so meager that the actual significance could not even be tested is a sound argument that with improved dust control the health experience would be satisfactory and a need to reduce dust concentrations to the order of 1 microgram per cubic meter of air is entirely unnecessary.

Bruxelles has promised to attempt to get the Subcommittee to revise its motion by deletion of the final sentence.

I would ask that you consider seriously transmitting the need for this deletion to Du Pont's representative on the Board of Governors so that if this question comes to the Board unaltered he, at least, would know of the issue that is involved.

If you should require any additional participation in this matter by me, please do not hesitate to call.

ORIGINAL SIGNED BY
JAMES F. MORGAN
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INDUSTRIAL HYGIENE

JFM/egg
12/16/77