

October 6, 1970

*True
of final
draft*

SUBJECT: BULLETIN NO. 12 - LEAD IN GASOLINE

TO: ALL MEMBERS OF THE LEAD INDUSTRIES ASSOCIATION, INC.

Gentlemen:

Bulletin No. 11, under date of September 23, primarily covered the Administration's proposed tax at \$4.25 per pound on lead used for the production of gasoline additives. It also commented that I was scheduled to testify before the New York City Council on its Interim Bill No. 306. I testified on September 24.

There were numerous witnesses for the New York City Council's Interim Bill No. 306, which would, if ultimately passed, eliminate lead in gasoline sold in New York City by January 1, 1974. DuPont, Ethyl and I spoke against this bill. We are reliably informed that it will be several weeks before this bill is considered by the full New York City Council. We make no prediction as to what the ruling will be.

Attached is a copy of the testimony I presented. By and large, it repeats what I have said during other appearances before Federal and State groups, but does include a somewhat detailed set of remarks on the type of misinformation which is being swallowed whole--this from a Dr. Schroeder at Dartmouth--by proponents of the removal of lead from gasoline.

We have heard nothing further concerning the situation in Washington where the Muskie bill must now be considered in joint committee meeting.

We will continue to keep you informed.

Sincerely,

J. L. Kimberley
J. L. Kimberley
Executive Vice President

JLK:ka

Attachment

PNYC00001119

N10171

STATEMENT ON INTERIM BILL NO. 306

TO BAN LEAD ADDITIVES

PRESENTED BY

J. L. Kimberley, Executive Vice President

LEAD INDUSTRIES ASSOCIATION
292 Madison Avenue
New York, New York 10017

BEFORE

Committee on Environmental Protection
New York City Council

September 24, 1970

PNYC00001120

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Mr. Chairman, gentlemen:

My name is John L. Kimberley, executive vice president of the Lead Industries Association headquartered here in New York. I am presenting this statement in opposition to City Council's Interim Bill No. 306 on behalf of our 60 member companies engaged in mining, smelting and refining, manufacturing and fabricating of lead and lead products.

The bill is perfectly understandable, but the objectives are not clear. 1-

1. If your objectives are to rid New York City of hazardous auto exhausts, that objective is commendable, but the elimination of lead in gasoline is not going to accomplish this.

Evidence from Bureau of Mines' studies reported as recently as May, 1970, indicate that the smog problem could be made worse, rather than better. This is because many of the present automobiles require a high octane gasoline to run and the compounds needed to make high octane fuels without lead are those which contribute to eye-irritating smog.

2. Although auto makers say they plan exhaust control devices that will work better with non-leaded gasoline, such cars are not available now. If and when such autos are available, the fuels -- low-lead and non-leaded -- needed for them will also be available. More than 14 petroleum companies representing over 50 percent of the gasoline sold are already marketing such fuels. Not many of these are yet in New York City, but surely will be.

3. Emission control systems that work with leaded gasoline and that also will trap lead emissions as well as the noxious gases have already been developed, demonstrated to better 1975 emission goals and nearly meet federally proposed standards for 1980. To ban leaded gasoline today would limit and restrict efforts to further develop systems for the control of automobile emissions to only one approach -- catalytic.

4. If your objective is the elimination of lead in the atmosphere, bear in mind that lead accounts for about one-third of 1 percent of total automobile emissions (calculated from HEW figures). The vast majority of emissions are carbon monoxide, hydrocarbons and nitrogen oxides. Removal of lead from gasoline, in itself, will have small effect on the emission of these gases.

5. It is the lead industry's strong conviction that all auto emissions including lead should be controlled. Work is progressing on devices -- traps -- to capture lead before it is exhausted. However, there is no evidence that lead in the atmosphere, from autos or any other source, poses a health hazard.

This means that there should be full consideration of all facts before action is taken, because the wrong move could be no remedy and in fact worsen the situation which presently exists.

In this connection it is worth pointing out that because of the peculiar location of New York City, passage of such a law banning the sale of leaded gasoline by 1974 would necessarily force many motorists to go outside the city limits -- to Westchester, Long Island, New Jersey, Connecticut and other places -- to fill up their cars regularly with the leaded fuels necessary for their operation.

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6. Lead is our fifth most useful metal which admittedly can be toxic if not properly understood and used. One example of this is the problem of childhood lead poisoning -- eating of old leaded paint in less advantaged areas of New York City. We have been working with federal, state and local health officials on this serious problem for many years. However, the effects on children from eating lead in this old paint has no relation to lead in the atmosphere.

So far as lead in the atmosphere is concerned, a number of studies including those done by American Medical Association (1966), World Health Organization (1965) and the U.S. Public Health Service (1965) have concluded that there is no health hazard now or foreseen from lead in the atmosphere. In fact, the World Health Organization found that New Guinea natives, with no real exposure to auto exhausts, had higher levels of lead in their blood than New York City residents.

We would also like to point out that certain industrial workers are exposed to far higher levels of lead for their entire working life than are ever found in New York City's air, without health impairment.

7. As to the effect of atmospheric lead on human welfare, I would like to devote the rest of my time to one example of the type of misleading information that is being spread about. Full documentation for what I am about to describe is available.

On September 1, 14 and 17, in news stories and editorial The New York Times carried statements covering tests on animals by Dr. Henry A. Schroeder of Dartmouth. I quote from the September 14 editorial:

"When fed to test animals, lead in amounts which are now taken in by most human beings has reduced life spans by 20 percent, and increased infant mortality rates, sterility and birth abnormalities."

This "gem" apparently came from work reported by Dr. Schroeder in 1963 and 1965. But in fairness to him he reported other results in the January, 1970 issue of the Journal of Nutrition. I quote completely and exactly a footnote from the latter paper.

"Previous reports have stated that the dose of lead was 5 ppm (parts per million). This dose was incorrect. A typographical error in our laboratory instructions resulting in five times the desired dose being used, both in the experiments begun in 1960 and in those here reported....When the error was discovered, the larger amount was continued."

My comment is that this is a rather casual way to admit that there was a 500 percent error in this so-called scientific experiment.

As also stated in the Journal of Nutrition, the early rats were also deficient in chromium, an oversight that was corrected in the rerun.

A chart on results of the second go-round showed no adverse effect on the rats longevity, reproduction capability or general activity --this in spite of the fact that the lead dosage was fed (not breathed) at levels over 227 times higher than a human's normal daily intake.

I will amplify this by a simple calculation based on Schroeder for rats and Dr. Robert A. Kehoe for humans.

Kehoe's research has shown that the average man takes in about 0.33 milligrams of lead in his food, drink and breath each day and that he also eliminates essentially the same amount. This lead is taken in with about 3 kilograms of food and drink daily.

Since one kilogram is equal to a million milligrams, the following calculation shows that the average man's intake of lead (which he also excretes) is about 0.11 parts per million of his food and drink intake.

$$\frac{0.33 \text{ mg/day}}{3 \times 1,000,000 \text{ mg/day}} = 0.11 \text{ parts per million}$$

Dr. Schroeder fed rats 25 parts per million or 227 times as much as in a normal human ingestion. Even so, his rats showed no adverse health effects.

In the present case, I think it fair to state that giving credence to Schroeder's work would be much the same as suspecting that one aspirin is dangerous to humans and then finding that 227 tablets won't harm even a rat.

This case is typical as to evidence against atmospheric lead. For eight months I have asked for specific data that atmospheric lead is dangerous now or foreseeably. No one has come forward with it.

The only responses we get are like those of Dr. Schroeder's. However, this is the type of approach and charge several members of the scientific community and ecology groups are using against lead.

To conclude, we believe that the removal of lead from gasoline prematurely could lead to:

- a. aggravated health irritations and problems
- b. create confusion and inflationary waste
- c. bring an exceedingly false sense of security
- d. interfere with a proper solution which we believe is well on the way.

One last comment. Consider all the facts carefully before you associate the very real problem of childhood lead poisoning from eating old paint with the question of lead in the atmosphere.

If there are questions I'll try to answer them. Since they may involve technical details of epidemiology I ask the privilege of calling Dr. J.F. Cole, Director of Environmental Research for International Lead Zinc Research Organization to join me.

Thank you for the privilege of making these remarks.