

ETHYL CORPORATION

1600 WEST EIGHT MILE ROAD

FERNDALE, MICHIGAN 48220

December 9, 1970

RICHARD K. SCALES
VICE PRESIDENT

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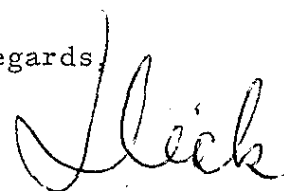
Dear Bob:

I was embarrassed to learn from your note of December 5 that we had dropped the ball in letting you know what came out of our efforts on the West Coast. As you may have heard since you sent me your note, Haagen-Smit rammed through the 1.5 ug standard despite the best efforts of everyone concerned.

In order to put this whole affair in proper perspective for our people, we prepared a relatively brief statement which Hess wrote up and sent to Larry Blanchard. We also sent a copy of this to Bob Douglass for distribution to the people in PCD. I attach a copy of this memo for you but did not include Hess' testimony since you, of course, were with us when he testified.

Once again, Bob, forgive me for not getting this to you earlier. My only excuse might be that since the hearing in San Francisco on November 15 I have been away and just returned to Detroit last Friday. Let me also say once again how much we appreciated your efforts. As you know, we felt that the deck was stacked against us but I think it was very important to get our case fully into the transcript since, while we may have lost this battle, we haven't lost the war yet.

Best regards,



RKS/jtd
Attch. (1)

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To Mr. L. E. Blanchard
 FROM H. E. Hesselberg
 SUBJECT California Ambient Air Quality Standard for Lead

Address Richmond
 Address Detroit

DATE Dec. 7, 1970

On November 19, the California Air Resources Board established an ambient air quality standard for lead of $1.5 \mu\text{g}/\text{M}^3$, 30-day average, supposedly based on health effects. This becomes the eighth air quality standard established by the State. For orientation purposes, the levels of lead in air in many urban locations throughout the State exceed this standard by a considerable amount. Specifically, values of 3.6 for Los Angeles and 3.8 for San Francisco were reported by the Board. In certain locations, particularly in Los Angeles, 30-day averages considerably higher than these values probably exist.

The recommendation for the standard of 1.5 was made by the Technical Advisory Committee of the Board on the basis of a recommendation from the California State Department of Public Health that the standard should be less than 2. This was based on the contention of Dr. Goldsmith, of the Department of Health, that slight changes in lead in air would result in increases in blood-lead levels. Further, Dr. Goldsmith postulated that slight increases in levels of lead in blood could be accompanied by a depression in enzyme activity which would interfere with hemoglobin synthesis. The recommendation of the Technical Advisory Committee was supported by a number of representatives of environmentalist groups, such as: Sierra Club, Friends of the Earth, and the Environmental Defense Fund, in addition to several individuals representing other militant ecology groups.

In the hearings which preceded the action of the Board, a great deal of opposing medical and aerometric information was presented by a number of eminently qualified medical and scientific experts in the field of lead and its possible relation to public health. This well-documented information supported their contention that there was no basis in fact for the proposed 1.5 standard. Experimental evidence was presented giving sound support for a tentative standard of $10 \mu\text{g}/\text{M}^3$. This is the value recommended by the American Industrial Hygiene Association and one which was recently adopted by the State of New Mexico. (See attached statement.)

As in the case of other standards the Board has adopted, the lead standard appears to be more in the nature of a goal rather than a level which can be attained with economic feasibility within a reasonable period of time. As an example, the recommended standard for oxidants is 0.1 ppm for a one-hour average. Present levels in Los Angeles are given as 0.75 ppm

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and the Board's own estimate is that with proposed control programs the levels will still be 0.2 ppm in 1985. In the case of carbon monoxide, the standard is 10 ppm for a 12-hour average and the estimates are that for Los Angeles this level will just be attained in 1985 if all control programs presently projected are accomplished. In the case of total suspended particulate, the standard adopted some time ago is $60 \mu\text{g}/\text{M}^3$ annual geometric mean. Here, the possibility of meeting the standard in many areas of the State is felt to be completely unattainable since natural background levels exceed the proposed standard and, therefore, reducing all stationary and mobile particulate emission levels to zero would not even approach the standard.

The Executive Officer of the California Air Resources Board, in an interview following the establishment of the lead standard and the action to reduce several of the other standards, commented that although the standards theoretically become effective at once it will take between one and fifteen years to meet them.

At a subsequent hearing of the Subcommittee on Air Pollution of the Assembly Transportation Committee of the California Legislature in Los Angeles on November 24, the Chairman of the Technical Advisory Committee of the Air Resources Board testified that meeting the new ambient air quality standard for lead of $1.5 \mu\text{g}/\text{M}^3$ for 30 days would require a reduction of lead emissions from motor vehicles of approximately 75% since automobiles are the principal contributors to lead in air. He went on to state that this could be done either by restricting lead in gasoline or by trapping. However, in commenting on the trapping approach, he said this would mean devices on all vehicles, new and used, when traps have been satisfactorily developed and proven. He then said that if legislation is desired to insure that lead levels are progressively reduced that the March 1970 recommendations, adopted by the Air Resources Board, delineating a gradual lead antiknock phase-out program would be the least costly and least wasteful of our natural resources. This recommendation called for a reduction to a maximum concentration of 2 g/gal in any grade of fuel and provided for at least one grade containing no more than 0.5 g/gal. Commencing January 1, 1975, at least one grade of fuel would be lead-free and on January 1, 1977, there would be no lead in any grade of motor gasoline.

While not stated at the Subcommittee Hearing, it appears quite obvious that its Chairman, Assemblyman Pete Schabarum, definitely has in mind the introduction of new legislation aimed at controlling the use of lead in gasoline with the new incentive of attaining the lead standard.

The California Air Resources Board has the delegated authority to establish standards for the emission of any substance from vehicle tailpipes. A petition is before the Board to establish a lead exhaust emission standard for all vehicles registered and operated in the State of 0.0 g/mile effective January 1, 1973. The Chairman of the Board has requested the Technical Advisory

Committee to study the establishment of a lead emission standard and indicated that this matter would be considered at the January 20, 1971, meeting of the Board.

It is certain that there will be a number of new bills introduced at the start of the 1971 legislative sessions relating to restrictions on the usage of lead antiknocks. Many will obviously be based on the objective of attaining the new lead standard. In addition, the Board may take some action to establish a vehicle lead emission standard which will give further support to new legislation.

H. E. Hesselberg

HEH:cl

cc: R. K. Scales

R. J. Ostrander

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