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February 17, 1971

Dr. Robert deFreville
Industrial Health Foundation, Incorporated
5231 Center Avenue
Pittsburgh, Pennsylvania 15232

Dear Bob,

I very much appreciate yours of February 15, 1971, dealing with a quote in the Industrial Hygiene Digest with reference to the pottery safe lead release. I was gratified to note "your offer to take correcting action etc".

I am sending a copy of this to Jerome F. Smith of Lead Industries. I believe he will take no action.

Here is the background on the situation. At the time of the publication the United States Potters Association were approving lead release according to a precise test. They were actually approving 4 parts per million or less. There was a "limited-approval" applied to lead release between 4 and 7 parts per million. The limited-approval included among other things notification of the manufacturer that the material should be re-engineered etc. I am sure you already guessed, that various efforts to condense the precise activity resulted in the casual reference to the U.S.P.A. program as 7 parts per million is okay.

I was in the unique position of being required to deal with this belief on the average of once a week from people all over the world. There were some minor difficulties created I am sure by individuals who did not bother to get the "whole story".

Very recently a major change has taken place. The FDA has

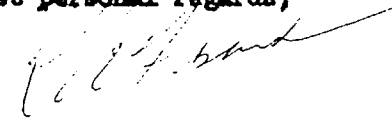
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asked the United States Potters Association to modify their standards using as a basis for their request the results obtained from a completely different testing technique. Tomorrow and the next day the world will be officially notified of the USEPA action which tends to cut their criteria, or results, in exactly half. So, the 7 parts per million becomes 3-1/2 and presumably the 4 parts per million becomes 2.

I now submit that the less said the better in official publications such as yours and the Pittsburgh Safety Council. Jerry Smith will get a kick out of this because the difference between 2 and 3-1/2 parts per million is not a very great "room for a margin of error". So I believe that somewhere along the line the analytical chemists will make some further adjustments when they decide to play the numbers game again.

Best personal regards,


Russell W. Frank
Corporate Safety Director

RWF:lk

cc: J. F. Smith-Lead Industries

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