

CC: GEW WDE
TEJ HLR
JML/GW² WSRailton
RGR JGS
TWJ

ST. JOE LEAD COMPANY
Smelting Division
Herculaneum, Missouri 63048

To: R. E. Peppers Dated: May 4, 1983
From: D. L. Vornberg
Subject: LIA Environmental Health Meeting

I attended the LIA Environmental Health Meeting in New York City on May 4, 1983. The Agenda is attached.

IV. OSHA Lead Standard-Update and Status of Reconsideration

(1) OSHA Activities (Medina)

The draft notice of proposed rulemaking that provided for a 150 air-lead has been withdrawn probably for political reasons. The announced reason, however, is because the Knowlton Caplan supplemental report to the CRA study (copy attached) had just reached the Assistant Secretary and was interpreted to the Secretary as suggesting that Batteries can attain the standard. In fact, according to the Battery people, it says the same thing as before but only now is being read and is certainly not being understood. (Caplan utilizes the lognormal character of the data in his explanations.)

Apparently a meeting is being held this Friday in Washington between OSHA, Caplan and Battery people to discuss the concepts in Caplan's report. The battery people are guardedly optimistic in getting their thing back on track at that meeting. There may be an attempt to redefine the definition of attainment at that meeting. It could have positive benefits for us if that occurred, however, I feel this will have to wait for a more "enlightened age".

Medina indicates that OSHA claims that it will go out with less controversial aspects of the NPR (4.4 hour respirator, drop ZPP, reduced monitoring, etc. and the tripartite agreement - less controversial?) within a few weeks. Then within a few months, they will come out for comment but not proposal with a second rule-making to deal with PEL's, etc.

They are saying that meeting with LIA to discuss tripartite could be held in the near future. Till now batteries are not in the tripartite agreement. OSHA would like to put compliance plan stay proceeding in D.C. Circuit Court in "Deep Freeze" for a while. To date, USW is going along. OSHA may put out notice vacating stay on batteries if Friday's meeting is not convincing. They would give batteries 6 months to a year to prepare their plans.

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(2) MRP Variances (Medina)

170 variance applications were received on the 50-40 blood lead trigger. OSHA indicates that it will eventually issue interim orders and probably punt for a while at that point. One man has been assigned part time to deal with this.

(3) Air Lead/Blood Lead Model (Putnam)

Following the statisticians (Joe Morgan for St. Joe) meeting, in Cincinnati, Ellen O'Flaherty received 500 sets of data from the participating companies (Redelfs provided data from St. Joe). The data set consisted of medically removed employees; of the 500, 150 had preemployment lead data - which was of special interest in her analysis. Early results indicate that blood shedding is neither uniform nor tenure related. No single model will predict the blood shedding of an individual. Her complete analysis will be out in 2 or 3 months and is intended to be of publishable quality. She will not look at BUNs, ZPP, creatine, job title, etc., in this first round, but has an excellent data base assembled for future efforts.

V. Blood Lead Comparison Program (Volpe)

Rosiland is requesting first quarter 1983 data and is shooting for June distribution. She is trying to tighten up the turnaround to make reports timely and thus more useful. She is looking for suggestions as to how to use the individual data base that has been collected. (RGR?)

VI. New Direction Grant Training Program (Maresca)

New newsletter is out. (copy being circulated separately)

Suggestions on expansion of program was sought. Suggestions included preparing video tapes on training Pb standard trainers. Also video tapes of medical experts talking to local family physicians on lead (for example, Sid Lerner's virtuoso 2-hour introduction from the regular physician conference).

VII. Third Party Liability Booklet (Maresca)

This booklet will be distributed for our viewing in about a week. If we want it for general mailing we should give orders to Maresca. This I believe is intended to reduce "failure to inform" liability of the Johns Manville debacle. We should take a good look at this.

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VIII. Material Safety Data Safety Sheets (Volpe)

Rosiland has collected a stack of safety data sheets on Pb/Cd/Zn/As/H₂SO₄ etc., which they will try and boil down to lowest common denominator and make available to all by early 1984. This may save us a lot of effort when the "Hazard Communications" regulation is finalized which requires that we have these available for inspection by our employees and may be required to mail to customers.

IX. 1983 Seminar for Physicians (Volpe)

October 5, to October 7, Innesbrook, Florida. Suggestions on improvement requested. We were urged to remind decision makers of variable content of program from year to year.

X. EPA Ambient Air Quality Standard

(1) Status Report of Development of the Lead Criteria Document (Putnam)

Three remaining topics must be put to bed before the external drafts of the new Lead Criteria Document will be circulated (thanks to LIA's efforts).

- (a) A mini-committee of statisticians was formed to resolve the conflict between Ernhardt (pediatrician that claims low lead effects are not harmful to children) and Needleman (who claims children with higher tooth lead values have lower IQ's [namely 3-4 points]). Ernhardt argues that Needleman's data does not account for the fact that children with higher teeth lead are also of lower socio-economic status and would be expected to have the lower IQ. She has her own study to counter his.
- (b) The German's who have research which identifies an essential body function which depends on lead have written to defend their work. They will make the trip to America if necessary.
- (c) The Haines II study which shows a one to one drop in blood lead with gasoline lead reduction is devastating to lead interests. Ethyl and DuPont have convincing counter arguments that explain the data based on terribly faulty sample design.

The external draft of the Criteria document is expected to be finalized by the end of the year. It then goes to CASAC who will hold hearings and decide. If they do not return it should be published in Spring of 1984. Then the arena moves back to EPA for proposed rulemaking. However, with elections coming up nothing is expected in 1984.

LIA continues to point out the outstanding professionalism of this documents progress. Industry is getting a chance to be heard at least.

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