

March 22, 1967

John R. Goldsmith, M.D., Chief
Environmental Hazards Evaluation Unit
Department of Public Health
State of California
2131 Berkeley Way
Berkeley, California 94704

Dear John:

I am sending to you, herewith, two items (1) a copy of a letter which I have written to Victor Sussman, and (2) a copy of my statement, as requested by the officials in the Commonwealth of Pennsylvania, following my appearance before them on January 19, 1967, in relation to lead in the ambient air.

The letter, as you will note, was written to Mr. Sussman in response to a letter from Administrator Schoenly, enclosing copies of letters from Katharine Boucote Sturgis and yourself, and inviting my comments. It seems only common courtesy to acquaint you with what I said about your approach to the problem and your view of the matter. It need not, and probably will not, surprise you to know that I disagree flatly with the conclusion in your letter that "it is a prudent Public Health policy not to permit long-term atmospheric exposure levels in excess of 5 micrograms per M³ a month, and that a case could be made for a lower standard." I am aware, of course, that this figure is the average of a series of variable results, many of which may be appreciably higher. I am also familiar with most of the difficulties involved in setting a standard on specifications that will apply satisfactorily to an highly variable environmental situation. Even so, as a standard for the general quality of the ambient air, the figure without definitive allowance for wide variation is unduly, almost ridiculously, low.

I have expressed myself as frankly and as fairly as I know how in my letter to Mr. Sussman. My criticism of your procedures and conclusions is expressed in much the same manner as I would express them in direct discussion with you, although I would go further with you, in speaking of the "body burden." It has to be considered with much more care than you have shown in dealing with it. But aside from this consideration, which is important, I must urge you to go a bit easier in ascribing specific significance to many of the small differences which have been observed in the groups under investigation. It is nothing short of reckless, in view of the variables that are not under control, to attribute these differences to atmospheric conditions. In saying this, I am not subtracting anything from the real significance of the data made available in the several surveys that have been made, including, especially, the Three-Cities-Survey. I am simply limiting the significance to that which can validly be claimed. This is all that can be expected, I think, of this method. I want to go considerably farther, by means of other

techniques, in answering questions, which cannot, in my view, be answered by the relatively coarse technique of the field survey.

But enough, for the present. I have merely wished you to know what I have said, so that there need be nothing obscure between us.

Cordially yours,

Robert A. Kehoe, M.D.
Professor Emeritus of
Occupational Medicine

RAK:wp