

September 2, 1971

Dr. J. Finton Speller
Secretary of Health
State of Pennsylvania
Harrisburg, Pennsylvania

Dear Dr. Speller:

I recently came across a news clipping from a Pittsburg newspaper which reported that the Pennsylvania Advisory Health Board has made lead poisoning a reportable disease and has set up certain criteria based on blood lead analysis for the classification of lead poisoning.

I certainly agree with the decision to make lead poisoning a reportable *disease*, but have some reservations about your contention that everyone with a blood lead concentration in excess of 80 ug/100g blood is lead poisoned. Certainly, it has been the experience of public health officials and occupational physicians that most symptoms of lead poisoning are rarely, if ever, seen at concentrations of lead in the blood even somewhat in excess of 80 ug/100g.

The problem may be a semantic one, but I think that consideration should be given to calling blood lead concentration in excess of 80 ug/100g of blood, in the absence of symptoms, something other than "lead poisoning."

As to reportability of blood lead, a question has occurred as to how broad your intent is. Does your reporting regulation apply to industrial workers who may show excess lead absorption or does it only apply to children? The Lead Industries Association has been very active over the past several decades in research and information dissemination on the questions involving lead in the environment. I would be most happy to discuss the results of our investigations with you and to discuss further the terms of your new Pennsylvania regulations.

Sincerely,

J.F. Cole, Sc. D.
Director, Environmental Health

cg:

cc: W.L. Mann

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