

October 24, 1942.

Dr. William M. Schmidt,
Medical Consultant, Industrial Division,
U. S. Department of Labor,
Children's Bureau,
Washington, D. C.

Dear Dr. Schmidt:

I am very glad to make an additional comment on the addition to Item 4 of the draft of "Standards for Minimum Age for Employment." There is no doubt, I think, that additions could be made to the list of items of work in which no young workers under eighteen years of age should be employed. However, the subject is covered fairly well in principle in the preliminary draft, and I did not see any very great advantage in adding new items. As to any change in Item 4, it would seem to me to be entirely unnecessary. The mixing of anti-knock compounds is an integral part of manufacturing operations for tetraethyl lead, and undoubtedly, this will be the case throughout the entire period of the war. Therefore, there is no point in making specific mention of this one item of the manufacturing process. On the other hand, there is certainly no objection to the inclusion of part b under Item 4. It would be a gross mistake, on the other hand, to include Item c. It is true that this is a potentially dangerous operation. It is also true that as this work is now handled, there is no significant lead exposure involved in it. For your information I should like to point out that there has never been a case of lead poisoning in this occupation, and that the persons engaged in it do not show any even slight increase in their level of lead excretion as evidence of lead absorption. Therefore, the person who proposed the inclusion of this group of men in this list was ill-informed and was thinking in purely theoretical terms rather than practical.

As the person who will have to make the decision as to whether younger persons should be employed in this occupation, I should not like to be bound by any such recommendation as this, ~~and~~ I can assure you that I should be loathe to advise the employment of minors in this work, but I can also assure you that I know of no lead trade in which it would be safer from the point of view of lead absorption, if it seemed advisable to change present policies.

Cordially yours,

Robert A. Kehoe, M. D.

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