

INTERNATIONAL LEAD ZINC RESEARCH ORGANIZATION, INC.

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May 10, 1971

Dr. Robert A. Kehoe
The University of Cincinnati
Kettering Laboratory
College of Medicine
Eden Avenue
Cincinnati, Ohio 45219

Dear Dr. Kehoe:

Thank you for your letter of April 29.

The situation regarding lead and ceramics and the standard set by the Potters' Association is in a very unstable state at this point. As you perhaps know, the U. S. Potters' Association has established a glaze surveillance program in which pottery is tested by the ASTM method using 5% acetic acid at 60°C for 30 minutes as the extracting medium. This method was originally devised by Mr. Cholak. However, certain deficiencies in this test have now been uncovered and the Food and Drug Administration is now using a different test which has a much longer extraction period.

The effect of this is that, in effect, the 7 ppm under the old test is now closer to 3 1/2 ppm by the new test. The FDA has retained the same 7 ppm standard but the extraction efficiency of their test is about twice that of the ASTM test. This points up the difficulty in setting a standard for lead based on a test which is not realistic in relation to actual use conditions.

The position that I have taken is that it is impossible to set a standard for lead release from ceramicware until we can actually relate by the various tests lead release to food stuffs under use conditions. This work is underway at Rutgers, but it has now been complicated somewhat by the new method that the FDA is promoting.

I don't mean to say that the results of the Rutgers study will give us pat answers. I think that a certain amount of judgment will still have to be exercised so as to provide adequate margins of safety. At this point, while I agree that 7 ppm may be a potentially hazardous level, I do not have proof that 7 ppm is not really something like .5 ppm or less under realistic conditions.

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In the meantime, it has been pointed out that on numerous occasions the 7 ppm represents a clear improvement over no standard at all and will prevent the overt lead poisoning cases which have inevitably been linked with extractions of a far greater magnitude.

Since this whole matter is now in such a state of flux, I have no idea what the outcome will be when we get to the stage of trying to relate lead extraction to actual use conditions. I will certainly contact you, for I feel certain that I will need all the help I can get to press for a standard which the pottery industry can tolerate and yet provide safety for the using public.

Sincerely,



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

cg:

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