

INTERNATIONAL LEAD ZINC RESEARCH ORGANIZATION, INC.

292 MADISON AVENUE, NEW YORK, N. Y. 10017
TELEPHONE 532-2373 (AREA CODE 212)
CABLE ADDRESS: NYILZRO NEW YORK

August 18, 1971

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

Dear Dr. Kehoe:

Occupational Safety and Health Act

During the last few days, I have tried on a number of occasions to reach you by telephone, but have been unsuccessful. Finally, I was informed that you are on vacation, and so, I am writing in the hope that this letter will reach you sooner than a phone call.

Recently, there have been some disturbing factors which have arisen relating to the new Williams-Steiger Occupational Safety and Health Act. These factors are disturbing since apparently the Department of Labor which enforces the Act has apparently taken the position that biological monitoring of personnel is not acceptable as a means of controlling exposure to lead. They are insisting that the monitoring of lead in air is the only acceptable means of assuring a safe working environment for lead industry workers. The standard they have chosen to use is the American National Standards Institute standard which is a time-weighted average of 200 ug Pb/m³ air. A copy of this standard is enclosed for your information.

I am sure that you can realize that this position on the part of the Department of Labor is disturbing to us and to a number of companies who have relied on blood lead analyses for years. We continue to feel that the regular monitoring of biological specimens from workers is the best way to protect them from lead poisoning. We refer often to your chapter in Patty and, of course, the ANSI standard also refers to this chapter.

American Smelting and Refining Company (Ken Nelson) has been cited to be in violation of the Occupational Safety and Health Act on the basis of air sampling in their plant in Omaha. ASARCO has protested this citation and there will be a hearing before an examiner sometime in the future to adjudicate the matter. We are currently attempting to assist ASARCO in this hearing since

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we feel that it will be a test case for the use of biological monitoring of employees in the lead industry. I would appreciate having your comments on this matter and would also like to hear from you regarding your willingness to testify on this matter in Omaha. We are also contacting Lynn Schall of the AIHA who has also expressed willingness to testify in support of the concept of biological monitoring.

It is our feeling that this matter is of utmost importance to the entire fields of industrial medicine and industrial hygiene as well as to the interests of the lead industry. I am looking forward to receiving your response.

I will be happy to meet with you at your convenience to discuss these matters in detail.

With best regards.

Sincerely,

J. F. Cole by DRA

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

cg:

Enc.

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