

June 21, 1971

Mr. H. M. Davis
Product Manager-Lead Foil
Revere
196 Diamond Street
Brooklyn, New York 11222

Dear Mr. Davis:

The question raised in your letter of June 17, is one that is difficult to answer. While I have had a considerable contact with a number of persons in The Food and Drug Administration in the Department of Health, Education and Welfare, the changes made in that organization have been such in the past year or two that I question seriously my knowledge of the thinking of individuals in this group and of their decisions of policy and procedure as a group. Furthermore, I suspect that this matter, having little, ostensibly, to do with food and beverages and drugs, would not come under their jurisdiction. The best thing I can do, therefore, is to acquaint you with my own thinking in this matter. I have no good reason to believe that it will have much to do with executive thinking in Washington.

(1) It would seem to me that if the use of the icicles of which you speak is limited to the Christmas Season, any likely or even remote hazard is likely to be too limited in time to be of much significance. I raise the question, therefore, of the degree of this limitation. Does anyone know anything, beyond supposition, about what people do with these articles?

(2) Any risk in handling the foil and the icicles would seem to me to be largely a matter as to whether either the foil or the icicles undergo surface changes of any kind which give rise to products of corrosion or oxidation which will rub off on the hands, or will be available for absorption to children who put them (as they do everything else) in their mouths. I am not talking about abnormal behavior, appetites and habits, but simply about the predilection of small children to put things into their mouths. The other thing called, as you probably know, "pica," is somewhat beyond appraisal.

Perhaps other questions could be raised, but this will give you the direction of my thinking. As I said above, if this matter is an affair of the Christmas Season only, any exposure to lead during that period only, would not seem to be of any great significance. As you probably know, however, lead is a "dirty word," especially at present. Certainly, the imaginations of somewhat apprehensive persons have been a bit overworked of late, and I think you are wise to anticipate some official consideration of this matter.

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I wonder whether the possibility has ever suggested itself of coating the foil or the icicles with some surface material such as a lacquer which would maintain its shiny surface, so essential for decorative purposes, from becoming corroded or dulled otherwise. It may well be that something of this sort has been done - or that some such thing is necessary or advantageous to preserve the attractive appearance of the foil. I wonder also whether the brightness of the surface of lead foil is enhanced by alloying the lead. Let me hasten to say that I am not a chemist or a metallurgist. I always go to these or other technical people for help in matters in which I do not have experience or training. My remarks in this paragraph, therefore, are merely inquiries and not advice. They are based, nevertheless, on the wish to forestall any difficulties which might arise, and from that point of view, they may be worthy of consideration.

Very truly yours,

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

RAK:wb

cc: Dr. J. F. Cole

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