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LEAD INDUSTRIES ASSOCIATION, INC.

292 MADISON AVENUE
 NEW YORK, N. Y. 10017
 TELEPHONE - AREA CODE 212
 OR 9-6020

To: All Members of the Lead Health and Safety Committee
 cc: Board of Directors, LIA
 Industry Development Committee, LIA
 S. F. Radtke

Re: Lead Air Quality Standard in the State of Pennsylvania

At a regular meeting of the Air Pollution Commission, Department of Health, Commonwealth of Pennsylvania, July 12th a tentative standard of 10 micrograms per cubic meter of air for lead averaged over 24 hours was proposed, with no more than a single occurrence of a higher value allowed in each 100 consecutive days. It is our understanding that at the next meeting of this Commission a vote will be taken to accept or reject this standard. If the Commission accepts the standard, public hearings must be held after a 30-day notice before the standard takes effect.

The State of Pennsylvania passed an Air Pollution Control Act in 1960 and among the many provisions of this Act was the designation of an Air Pollution Commission appointed by the governor. Among the many duties of this Air Pollution Commission is the following: "Establish and publish maximum quantities of air contaminants that may be permitted under various conditions at the point of use from any air contaminant source in various areas of the Commonwealth so as to control air pollution."

Such standards would be promulgated as Regulations and would be enforced as part of the Air Pollution Control Act. So far in its history the Commission has adopted four Regulations, together with appropriate Guides for Compliance with Regulations. None of the previously adopted Regulations is specific for any air pollutant and the proposed standard for lead would be in the first batch of specific air quality standards. At its meeting on July 12th the Commission also accepted tentative standards for six other materials besides lead.

I contacted Dr. Allen D. Brandt of the Bethlehem Steel Company, who is Chairman of the Air Pollution Commission, and pointed out to him that we felt that 10 micrograms per cubic meter is unrealistic, not dictated by considerations of health, and, in addition, that we have several research programs under way at the present time designed to provide scientific knowledge to those interested in setting such standards. Dr. Brandt advised me to write a letter to the Pennsylvania Commission setting forth our position, and I did.

July 28, 1966

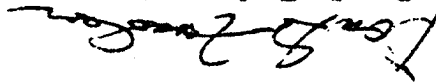
Next, I obtained an appointment at Harrisburg with the Director of the Division of Air Pollution Control of the Department of Health, Mr. Victor H. Sussman, in order to explain in greater detail our position in the matter of air quality standards. Mr. Sussman asked that John Cleland, Chief, Abatement Compliance Section and Ben Brodovitz, Jr., Chief, Technical Services Section, sit in on our discussion. I reported to these gentlemen that we had anticipated the need for air quality standards, had discussed this with the United States Public Health Service and the State of California Department of Public Health (which has a mandate to set such standards) and had all agreed that more information is needed before logical and reasonable standards can be set. That about four years ago we had asked Kettering Laboratory to conduct for us human exposure studies involving low level amounts of lead in specially designed chambers, which studies would be relevant to the health of the general public. The state people appeared to be impressed with the details of our studies and the scientific approach that our industry is taking through research.

I then asked upon what basis the 10 microgram figure had been derived, and was told that it was about 1/20th of the Industrial Hygiene Threshold Value of 200 micrograms per cubic meter of air. We then had a technical discussion concerning the fallacy of such an approach to ambient air quality standards, and Mr. Sussman pointed out to me that we should really be pleased that they had only taken 1/20th of the Industrial Hygiene limit, since in the case of beryllium they had used 1/100th of the Industrial Hygiene limit. Mr. Sussman further pointed out to me that in his opinion the Three Cities Survey has shown that average amounts of lead in air do not exceed 3 micrograms per cubic meter and therefore we had nothing to complain about. When I pointed out to him that in my opinion the 10 microgram value would be difficult for some of our lead plants to meet, he told me of a secondary smelter in Pennsylvania at which 24 hour samples had been taken by the Division and that the highest value obtained had been 5 micrograms per cubic meter.

In summary, we had a very interesting discussion and the state air pollution people were very interested in our research projects, but did not agree that their action in setting a standard at the present time is premature. It seems to me that we must take all necessary steps to make certain that our voice is heard before the next meeting of the Air Pollution Commission. These meetings are held at the call of the Chairman, and the next one has not been scheduled as yet. At the end of this report I list for you the names of the members of this Commission.

I think we are faced with a rather serious situation, a situation that is more serious in its implications for the future than it is right now, because, as you know, as soon as one government agency takes an action of this kind we will have many others wanting to do the same. I have no concrete suggestions for action to offer to you at this time, but I think it behooves all of us to make an attempt to accumulate as much factual data as is possible about the air outside of our own plants. In the meantime your staff will keep in touch with the situation and keep you informed.

Very truly yours,



Don G. Fowler

Director of Health and Safety

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COMMONWEALTH OF PENNSYLVANIA
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AIR POLLUTION COMMISSION

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