

May 26, 1969

Dr. Wave E. Culver
National Air Pollution Control Administration
411 West Chapel Hill Street
Durham, North Carolina 27701

Dear Doctor Culver:

In accordance with your request, by way of the telephone today, I am sending herewith two articles, (a) the text of my statement at the Public Hearing in Pennsylvania (which, no doubt, is recorded in the official record of the proceedings of the hearing) and (b) a photocopy of a reprint of my paper at the Fifteenth International Congress on Occupational Health. The latter was presented there in order to describe clearly, for the international audience, many of whom had reasons to be concerned, the physiological criteria which I had considered to be the necessary basis for a satisfactory standard for lead in the ambient air. Since this had been in our minds from the earliest period of our awareness of the basic character of the metabolism of lead in the healthy human subject, it seemed to be appropriate to put it on record. (It is somewhat unfortunate that this record is so difficultly accessible, but I thought this could readily be remedied in this country, and I knew, moreover, that some of the hygienic authorities, especially in Sweden and West Germany, were concerned.)

I have not published the typed statement which I am sending you, nor have I distributed it to more than a few immediately concerned persons. I would not like to have it distributed widely, where it might be believed that I advocated a standard of 18 micrograms per cubic meter of air. You will note that I proposed this in an highly tentative manner as a substitute for the 5 micrograms per cubic meter advocated by the Pennsylvania authorities, which I had arrived at by means of the same type of calculation (from incorrect numbers) which they had employed. I have not believed, at any time, that there was any reason for plucking a number out of the blue, where experiments were under way from which reasonable conclusions could be reached.

I would take a totally different view of this matter, if even a scintilla of evidence could be obtained for the existence of the risk of lead poisoning among our people from the lead in the ambient air in combination with that in food and beverages - that is, from the common environmental sources of lead absorption. However, in view of the very real hazards of employment in many of the lead-using industries, and the high incidence of occupational lead poisoning (about which few persons in any segment of our society are informed or are much concerned), and in the recognition of the sad fact that thousands of infants and young children up to or a little beyond 3 years of age are poisoned annually in this country, (20 to 25 percent of them die), while we are checkmated by the cost of cleaning up

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the housing responsible for this disease, I simply cannot bring myself to understand, much less to justify, the attitude which holds the lead in the ambient air to be an urgent problem of public health at this time. It is admittedly a significant problem which should be solved by establishing appropriate standards of safety as soon as it can be done reliably. This, I believe, can be done shortly, by the common agreement of persons who understand the issues, and are prepared to let the chips fall where they may in matters of economy.

I think you will perceive that I am a bit sensitive on the point of my own position in this matter. I am indeed more than a little disgusted that, at this stage of my life, I am regarded by some as the devil's advocate for reasons of association or prestige. I am not at all unconcerned about my scientific and, especially, my professional reputation. But I am not a cynic, nor am I unduly disconcerted by human follies. I fully expect that, after the emotional outbursts in this matter have subsided, we shall find a rational basis, not only for this standard, but for others which may have to be tentative while we learn the facts which will put them on a firmer foundation.

Sincerely yours,

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

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