

June 7, 1971

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Dear Jerry:

Thanks for your Letter of June 1, and for the documents describing the new surveillance program prepared by the U.S. Potters Association, with the collaboration (or at least the approval) of the Food and Drug Administration.

I have submitted this to Mr. Choiak who considers the test to be satisfactory, in the belief that it is not likely to yield different results from the one devised here. Their acetic acid solution is 4%, and ours is 5%; but their timing of the test extends it to 24 hours. The latter procedure would, in some instances, at least, make their test more severe. As to the atomic absorption procedure, we are quite prepared to accept this as satisfactory. As you know, doubtless, our people are using it after parallel comparisons. I refer to these details, since, in the absence of parallel comparisons, the relative severity of the two procedures is not certainly established. I would not quibble about this.

As to the standard approved by F.D.A., as stated by the Potters Association, I definitely object to it, quite apart from its truth or falsity as a level of safety for pottery, itself. It is simply not consistent with the position taken generally by the F.D.A.; namely, that any quantity of lead added unnecessarily or avoidably to food or beverages, is adulteration under the law, and so is not to be countenanced as satisfactory. We were able to show that it is - and has been for a long time - possible to achieve a glaze from which lead can be leached out only to the extent of 2 p.p.m. by the test which was employed. There is, I believe, no good reason for encouraging potters to be lenient in this matter. What can be done should be required. It is not proper to add extraneous quantities of lead, from any source, unless it is necessary to do so in order to achieve a socially desirable purpose. One can compromise a little, perhaps, in matters of aesthetics, and to obtain a more colorful character of life and surroundings. However, we have taken the position, previously, in official governmental circles, that this should not be done. I wonder why, in this instance, it seems satisfactory or desirable to do so. I think the Potters are unwise to accept such an unnecessary compromise.

I would be pleased if you would present this view of mine to Mr. Mervin, and find out whether he agrees, and if not, why not. He has always had a reasonable and sensible attitude, it seems, and I value his opinion. If he and the others do not agree, I would have no right, to impose my views upon them, or on you.

Sincerely yours,

RAK:wb

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