April 15, 1958

Mr. J. B. Beck, Technical Director
East Texas Pulp and Paper Company
P. O. Box 816
Silsbee, Texas

Dear Mr. Beck:

Your letter of April 7 and the samples that accompany it present me with an unusual situation, which I must trouble you to clarify a bit.

I must presume that you know what you want done, but I'm afraid you have not let me in on it. You say that you want chemical tests with reference to the presence of "compounds such as phenol or mercury," but you also speak of odor and taste. If you want to know how much phenol and mercury are present in these materials, our analytical staff can find out and report the facts, but we will not have the faintest idea as to whether these would be dissolved out of the material by this, that, or the other type of food that might be put into cartons of this material. Nor will we be able to say anything about any other "detectable compounds." The analysis for these two materials in the two samples will cost us about $20.00 to carry out.

If I may say so without any intended discourtesy, I believe your approach to this matter is incorrect. Certainly it is, so far as we are concerned. This is not a commercial or testing laboratory which performs services for fees. It is a research unit in the University of Cincinnati, concerned with the investigation of problems of industrial health, and, in suitable instances, problems of public health that stem from industry. We operate entirely without profit, but at actual cost, and we serve industry, as well as our medical colleagues in industry, when our service is in the nature of a professional courtesy and in the public interest. I would not trouble you with this explanation but for the fact that it seems to be necessary.

The tests you propose will not enable us to advise you as to whether these materials will or should be acceptable to the Food and Drug Administration. Perhaps you have information to indicate that this is all that is necessary, but if you do not, I suggest that you tell me (in confidence, of course) what your product is, how it is made and what are the compounds that may be in doubt from the aspect of the public health. It may be that no tests are needed, but if certain information is needed, I think we should be put in

position to suggest to you what should be done to supply such information as will answer your purpose and meet the requirements of the Food and Drug Administration.

It may be that I misunderstand your position as well as your wishes, but if so, I trust that you will present the problem more fully. We should be doing you a disservice, if we were to proceed, as you have suggested, on the assumptions that would be necessary. We should also be guilty of irresponsibility.

Sincerely yours,

Robert A. Kehoe, M.D.

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