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Sent to VIP's
of
LIA
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July 3, 1968

CONFIDENTIAL

Re: Ambient Air Standard for Lead

For the last several years, there has been increasing interest on the problem of air pollution. The question of lead in the atmosphere has received a great deal of attention. The Lead Industries Association has participated in many meetings including Senate hearings during this time, and has consistently taken the position that insufficient evidence was at hand to justify the creation of ambient air standards for lead.

In spite of our efforts - and in spite of on-the-spot testimony for the lead position (except in Dallas), the States of Pennsylvania and Montana and the city of Dallas have seen fit to establish a standard for lead in the atmosphere at 5 micrograms per cubic meter of air averaged over a 30-day period. The adoption of the same standard for Albuquerque, New Mexico and its county seems imminent.

In more recent months, scientists and others interested in air pollution have taken a new and definite stand on this matter and as of this date, it is fact that there is general agreement among a large majority of those concerned, that a properly conservative standard for lead in the atmosphere should - on the basis of today's knowledge - be established at 10 micrograms per cubic meter of air averaged over 30 days, rather than the 20 micrograms per cubic meter averaged 30 days for which LIA has been most recently pressing - as with the American Industrial Hygiene Association.

A supervisory committee appointed by the Board of Directors has met with the LIA staff and, on hearing all of the facts as presently exist, has agreed that the LIA should accede to the judgment of others outside of the industry, though stressing that any standard should be considered "tentative" until more data is available from programs now underway - as through ILZRO and others.

The purpose of this letter is to report the present status of this situation, and that LIA will continue its work in the field, though now in a position where it must accept the majority position, at least for the present.

Attached hereto is a chronological listing of recent and pertinent events. Please feel free to write me on this question.

Sincerely,

Aubrey M. Callis
President

NO OTHER COPY TO YOUR
COMPANY UNLESS INDICATED.

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LISTING OF SIGNIFICANT DEVELOPMENTS SINCE 1963 AS RELATED TO LEAD IN THE ATMOSPHERE

1. December 10, 1963

LIA established Health and Safety Information Service - $40,000 in budget for 1964. Primary purposes to distribute information on lead toxicology and to counteract misleading statements in professional as well as popular press. Kettering Abstracts and first of the "Facts Bulletins" were prepared as a result.

2. December 15, 1964

Directors budgeted $35,000 for conduct of Health and Safety Information Service during 1965.

3. September, 1965

C. C. Patterson published in the Archives of Environmental Health his paper "Contaminated and Natural Lead Environments of Man." This was picked up by the New York Times, among others, and has caused much concern. (The story of lead in recent vs. ancient polar snow and ice.)

4. December 7, 1965

LIA Board of Directors approved $111,000 for 1966 expenditures in Health and Safety Public Relations Program and engaged public relations firm of Hill and Knowlton to advise and act. Also approved $31,500 additional for continuance of Health and Safety Information Service.

5. December 13/15, 1965

Symposium on Environmental Lead Contamination sponsored by U. S. Public Health Service. Papers and discussion on lead contamination of air, water and food. No new data presented but recommendations made on all aspects of lead's use. LIA attended.

6. January 13, 1966

At Georgia Tech, V. G. MacKenzie, Chief of Division of Air Pollution, USPHS stated that December, 1965 symposium was first step in needed re-examination by government, industry, and scientific community of total problem of environmental lead contamination. Question of lead in gasoline introduced. Entire subject receiving attention at highest levels of government as indicated by November, 1965 report of Environmental Pollution Panel of the President's Science Advisory Committee which included a proposal for registration of fuel additives not consumed during combustion.

7. April 6, 1966

Dr. R. I. Larsen, USPHS presented a paper "Air Pollution from Motor Vehicles" at a meeting of the New York Academy of Sciences citing Russian action in establishing standard of 0.7 micrograms per cubic meter of air for a 24-hour period - astandard not accepted by any other country. LIA attended.

8. May 17/19, 1966

Paper by Dr. Harriet Hardy, MIT "Problems Posed by Environmental Contamination with Lead" at meeting of Massachusetts Medical Society, Boston. Dr. Hardy has expounded, on many occasions, on her concern for the effects of lead on segments of the population such as the ill, pregnant women, etc. LIA attended.

9. June 7 through 15, 1966

U. S. Senate Subcommittee Hearings on air and water pollution (Muskie Committee) emphasis on lead. Several solid days of testimony before Senator Muskie and his associates - C. C. Patterson appeared and repeated his earlier fears. Felix Wormser testified on behalf of LIA (copy of Wormser's testimony to all members at that time). LIA attended.

10. July 27, 1966

Representatives of the lead industry, American Petroleum Institute and USPHS met and agreed to form a committee to be known as the USPHS Lead Liaison Committee to monitor all lead studies, plan future ones and act as clearing house for information on subject. Subsequently, January 12, 1967 this committee was instrumental in initiation of studies similar to the Three City Study and that involving human exposure at Kettering Laboratory, University of Cincinnati.

11. October 18/19, 1966

Paper "Lead Research: Current Medical Developments" presented by Dr. Stopps of Du Pont at annual meeting of Industrial Hygiene Foundation. This paper reported "no adverse effect on health of workers in TEL industry." LIA has distributed copies.

12. November 1, 1966

Paper covering World Health Organization Study on blood and urine measurements presented by Doctors Goldwater and Hoover of Columbia University at APHA Annual Meeting. This paper emphasized that body lead in remote areas of the world as New Guinea are as high as in many highly industrialized areas.

12. November 1, 1966 (continued)

Also, that there has been no significant change in blood and urine lead levels during the past three decades. LIA has reprinted this paper and distributed it widely.

13. December 7, 1966

LIA's Board of Directors approved the raising of $200,000 for 1967 expenditures as total to cover Health and Safety Information Service Program along with the Public Relations Program.

14. December, 1966

LIA made broad distribution of paper "Lead In the Environment" by Dr. J. C. Calandra. This paper had been presented at the Annual Meeting of LIA March 30/April 1, 1966. The author concluded "Amounts of Lead from all sources to which the general population is exposed do not constitute a health hazard."

15. January 30, 1967

President Johnson spoke to Congress on air pollution calling for registration of all fuel additives with the Secretary of HEW.

16. Early 1967

A survey on "Public Knowledge and Attitudes on Lead" conducted through Hill and Knowlton for LIA during November, 1966 indicated that a far larger segment of the population believes lead is "harmful to health" than has knowledge of any of lead's major and beneficial uses.

17. January, 1967

API background paper "Lead in the Environment" as developed by Committee on Public Affairs of API was prepared and distributed. This paper is intended as a ready reference source in answering questions on lead from automotive engines.

18. January 19, 1967

Public Hearing, Harrisburg, Pennsylvania by Pennsylvania Air Pollution Commission. From this meeting came (April 25, 1967) Pennsylvania Tentative Ambient Air Quality Standard for Lead at 5 micrograms per cubic meter of air averaged over 30 days. Dr. Kehoe, as an individual in connection with lead, testified at the January meeting, pointing out that the Pennsylvania

18. January 19, 1967 (continued)

Commission's calculations should have yielded 18 micrograms instead of 8.3 In his opinion, the Commission had used his data incorrectly. LIA attended the Harrisburg hearings and assisted in the preparation of Dr. Kehoe's statement.

19. May 27, 1967

The State of Montana adopted the same standard as Pennsylvania for lead in the atmosphere. Testimony assisted by LIA was instrumental in raising the standard from an originally proposed 1 microgram to the 5 micrograms adopted. Note: It is believed on good evidence that the influence of the USPHS was substantially involved in both the Pennsylvania and Montana situations.

20. March, 1967 (Released June, 1967)

State of California report "Lead in the Environment and Its Effects on Humans." This report made recommendations that steps be taken to prevent an increase of emissions of lead from gasoline and that studies be undertaken on the feasibility of reducing and/or eliminating lead additives. It stated also that an ambient air standard for California is needed as soon as possible.

21. May 16, 1967

An excellent paper "A Look at the Economics of Manufacturing Unleaded Gasoline" as presented at a meeting of the API.

22. Spring 1967

Mobil Oil Corporation published a primer on air pollution including a section on the need for lead in gasoline. LIA has distributed copies to the members.

23. Spring 1967

National Society for Clean Air, London, England, published "Air Pollution from Motor Vehicles." Factual and excellent summary includes several sections on lead additives and repeats "there is no evidence yet that lead additives in petrol give rise to toxic lead emissions in motor vehicle exhaust."

24. October, 1967

USA Standards Institute Z-37 Committee met to consider proposed change in Threshold Limit Value for Lead in Air. LIA proposed standard for industrial exposures at 200 micrograms. However, two government representatives suggested that the standard should be reduced from 200 to 100 micrograms per cubic meter. Presently, the 200 figure is being readied for a comprehensive letter ballot.

25. October, 1967

U. S. Department of Commerce issued a report "The Automobile and Air Pollution." Of particular interest is the recommendation that the Federal Government establish standards for lead in gasoline which will prevent any further increase in the total quantity of lead emitted to the atmosphere.

26. December 5, 1967

LIA Budget Meeting for 1968. The Directors approved the expenditure of $75,000 raised in 1967 and not expended for the continuation of the Health and Safety Public Relations Program during 1968.

27. January, 1968

LIA published and initiated what is developing into a wide distribution of "Facts About Lead and the Atmosphere."

28. Winter and Spring 1968

Ambient Air Quality Guide for Lead under preparation by Committee of American Industrial Hygiene Association. Fowler of LIA has been commissioned to prepare an ambient air quality guide for lead and on April 16, 1968 reviewed the matter with the LIA Health and Safety Committee who recommended the submission of the standard based on 20 micrograms per cubic meter of air averaged over 30 days.

Discussion at this April 16th meeting suggested some dissatisfaction with the figure 20 but the recommendation held for submission to AIHA.

29. May 14, 1968

AIHA Subcommittee on Ambient Air Quality Standards met and strong opposition to the submission of 20 developed. It became apparent that the TEL industry felt strongly that 20 was too high and that 10 should be the number included in the air quality guide.

30. June 5, 1968

New York meeting arranged by API, Air Pollution Control Association, and AIHA. At this meeting it became apparent that LIA was alone in its support of 20 for the ambient air standard for lead.

31. June 13, 1968

Advisory Committee appointed by the LIA Board met with LIA staff to consider the situation in its entirety. It was agreed that Fowler should maintain his position with the AIHA Committee and discharge his obligation to prepare an ambient air standard for lead, using the number 10, but emphasizing that this should be considered as a tentative standard and that the matter should be re-examined when the results of continuing and expanded research are more clearly defined and conclusive, and that his reservations on this matter should be made a part of the permanent record of the AIHA deliberations.