

FEDERAL TRADE COMMISSION

WASHINGTON, D. C. 20580

New York Office:
Federal Building
26 Federal Plaza
22nd Floor
New York, N. Y. 10007

*Acknowledged by Mr. Parker
on July 28*

Dr. Robert Kehoe,
Environmental Health Service,
Room 104,
Kettering Laboratories,
Cincinnati, Ohio 45205.

Dear Dr. Kehoe:

As you have already been informed by Mr. James A. Trodden of this office the Federal Trade Commission is currently conducting an investigation under Section 5 of the Federal Trade Commission Act to determine whether there are any hazardous health consequences involved in the use of lambs fur or similar products treated with lead acetate dye and affixed in a number of ways to wearing apparel. Of special concern is the possible effect of the lead residue on children who may come in contact with said garments. For example it is not unlikely that children who have pica may unwittingly ingest the substance. The lambs fur in question is used as a trimming on women's coats. The trim is located around the collar and cuffs of said garments.

Samples of the fur, treated with the lead acetate dye, have been obtained at the retail level. At the Commission's request the Food and Drug Administration has made an analysis of extractable lead content on said pieces. The results of these tests are outlined in this correspondence.

KE 0013854

The Food and Drug Administration performed its tests in the following manner. A weighed piece of fur approximately 9 square inches with a $\frac{1}{2}$ inch density was soaked for one hour in distilled water. By use of an atomic absorption spectrophotometer the quantity of lead in the solution was determined. A check analysis was made. In this second analysis, a second piece of fur of the same size was soaked in water for one hour and analyzed for lead by the dithizone method. In most cases a composite check was made employing the spectrophotometer and the dithizone method. The results of said tests are as follows:

Sample No. 196-508C
Initial analysis - 1533.3 ppm
Check analysis - 41.3 ppm
Composite analysis
By spectrophotometer - 17.3 ppm
By dithizone - 14.3 ppm

Sample No. 196-507C
Initial analysis - 947.4 ppm
Check analysis - 250 ppm
Composite analysis
By spectrophotometer - 540 ppm
By dithizone - 666 ppm

Sample No. 196-506C
Initial analysis - 543.9 ppm
Check analysis - 508 ppm

Sample No. 196-505C
Initial analysis - 618.8 ppm (cuff)
207.3 ppm (collar)
Check analysis - 306 ppm (cuff)
304 ppm (collar)
Composite analysis
By spectrophotometer - 680 ppm (cuff)
472 ppm (collar)
By dithizone - 750 ppm (cuff)
1666 ppm (collar)

Dr. Robert Kehoe

- 3 -

Sample No. 196-504C

Initial analysis - 192 ppm (cuff)
304.8 ppm (collar)
Check analysis - 170 ppm (cuff)
369 ppm (collar)

Sample No. 196-503C

Initial analysis - 1089 ppm (cuff)
446.7 ppm (collar)
Check analysis - 1351 ppm (cuff)
1071 ppm (collar)
Composite analysis
By spectrophotometer - 1300 ppm (cuff)
1220 ppm (collar)
By dithizone - 830 ppm (cuff)
1250 ppm (collar)

Sample No. 196-502C

Initial analysis - 651.9 ppm (cuff)
705.8 ppm (collar)
Check analysis - 1179 ppm (cuff)
893 ppm (collar)
Composite analysis
By spectrophotometer - 1568 ppm (cuff)
2240 ppm (collar)
By dithizone - 1500 ppm (cuff)
666 ppm (collar)

In order to assist the Federal Trade Commission in its determination as to the possibility of hazardous consequences associated with the use of lead acetate dye on said items it would be appreciated if you could comment on the possible hazards involved in the sale or use of such products.

Your comments should be addressed to Mr. James A. Trodden of this office to whom the matter has been assigned.

KE 0013356

Dr. Robert Kehoe

- 4 -

Thank you for your cooperation in this
matter.

Very truly yours,

FEDERAL TRADE COMMISSION



Albert G. Seidman,
Attorney in Charge,
New York Office.

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