

LEAD INDUSTRIES ASSOCIATION

Graybar Building, 420 Lexington Avenue
New York, N. Y.

December 12, 1936.

To Members of the Lead Industries Association:

Subject: Air Hygiene Foundation of America

The Air Hygiene Foundation of America, of which the Lead Industries Association is a member, held a meeting in Pittsburg on November 24, to consider some of the problems of the Foundation. We were represented by Mr. Andrew Fletcher, Vice President of the St. Joseph Lead Company. A copy of Mr. Fletcher's report is attached.

The Foundation is broadening the basis of its support to carry on its studies and scientific investigations as explained in Mr. Fletcher's statement. You will probably receive, if you have not already heard from him, a letter from Mr. W. B. Meller, Managing Director of the Foundation, inviting you to subscribe individually to the work of the Air Hygiene Foundation. In making your decision in this matter, I feel sure that the comments of Mr. Fletcher will be very helpful.

Respectfully submitted,

H. W. Townsh

Secretary.



COPY

ST. JOSEPH LEAD COMPANY
250 Park Avenue,
New York

December 9, 1936.

Mr. F. E. Wormser, Secretary,
Lead Industries Association,
420 Lexington Avenue,
New York City.

Dear Mr. Wormser:

In compliance with your request, I attended the Meeting of the Air Hygiene Foundation of America, held in Pittsburgh on November 24, 1936, where upwards of two hundred persons were present. Reports covering the legal, medical and engineering aspects of the dust problem were presented. As extracts of the proceedings will shortly be available, it is not necessary for me to discuss them, because the immediate phase of the problem is to make some recommendations as to the course that might profitably be followed during the year 1937 by members of the Lead Industries Association.

As you probably know, there is a tendency throughout the United States to include under the Compensation Laws injuries suffered from inhalation of industrial dust, and unfortunately, so little is known about the hazard that the various legislatures will probably pass laws setting standards, detailing regulations as to the engineering aspects, etc., without any real knowledge of the problem or necessity.

As a case in point, I have recently noticed a great tendency on the part of dust authorities, such as the U.S. Public Health Service and even the U.S. Bureau of Mines, to adopt the attitude that all dusts are hazardous until proven harmless, and that dust concentration of over fifty million particles per cubic foot, even when the dust is believed non-toxic, should be prevented. I also call your particular attention to the report of the Dust Control Committee in Rock Drilling Operations, which has been submitted to the New York State Industrial Board for inclusion in the State Industrial Code, wherein the following definitions have been used:

"Silica bearing rock means a rock formation having as a component part any free silica dioxide."

"Injurious silica dust concentrations shall mean dust produced from drilling silica bearing rock which is in excess of ten million particles per cubic foot, as determined by an approved dust count method."

With the help of the Research Department of the Metropolitan Life, the St. Joseph Lead Company took dust counts and we found concentrations of twelve million particles in our wet drilling operations. I am informed that in drilling in granite, where the "wet-ability" of the rock is not as great as in dolomite, the dust concentrations even under the wet method run as high as fifty million. It should, therefore, be quite apparent that the adoption of any regulations as outlined above, wherein a standard of ten million is recommended, would have a very serious effect on industry. Workmen who contracted ordinary diseases, as for example, tuberculosis or heart trouble, might possibly even sustain the contention before a Compensation Board that their con-

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dition was the result of working in a dusty atmosphere, and an award might be granted as the dust concentration was greater than that prescribed under the State Code.

The problem is not confined to only mining operations, as every industry has some dust or gas, and it will be but a short time after the setting of standards for mining occupations when standards will be set for the dust and gases of a toxic nature incident to other operations.

In view of present conditions, it seems to be absolutely imperative that there be some organization in the United States, where legislatures, industry and all interested parties can go for advice, and where competent research work can be undertaken. If all phases of the problem were known, research would not be necessary, but the longer I study the matter, the more I am convinced of how little is actually known of the problem.

At the present time, the Air Hygiene Foundation has the support of the leading authorities on industrial dust, for example, Dr. Sayres, U. S. Public Health Service; Dr. Lanza, Metropolitan Life Insurance Company; Mr. Philip Drinker, Harvard School of Industrial Hygiene; Dr. Gardner, Saranac Laboratories, and their interest is evidenced by the extremely competent reports that the Foundation has issued covering the work done during the year 1936. There is no reason why their support and the recommendations for research work outlined by these gentlemen cannot be profitably undertaken, if the Foundation has sufficient financial resources.

I frankly have never been impressed with the manner in which the Foundation has been handled from a financial angle, for it has been a great mistake to permit trade organizations, like the Lead Industries Association to become a member upon paying dues of \$500. a year, as obviously sufficient financial backing could not be obtained on this basis. Although the Air Hygiene Foundation has today approximately eight hundred companies interested in its work through associations, the contribution on the part of the trade associations for the year 1936 was only about \$15,000, whereas the Foundation spent about \$30,000. For 1937, the minimum budget that the Foundation should have, would be \$100,000, if suitable research work is to be undertaken and data prepared, that would be of help to legislatures, the Federal Department of Labor, etc. The only way that these funds can be collected is by having the Lead Industries and other trade associations urge their members to contribute to the Foundation by becoming members under the schedule adopted at the meeting held on November 24, 1936, which is as follows:

<u>Group</u>	<u>Number of Employees</u>	<u>Annual Dues</u>
1	20,000 and over	\$1,000.00
2	10,000 to 19,999	750.00
3	5,000 to 9,999	500.00
4	2,500 to 4,999	350.00
5	1,000 to 2,499	200.00
6	500 to 999	150.00
7	100 to 499	100.00
8	Less than 100	50.00
9	Employer Associations	50.00

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While at first thought the annual dues may seem rather high, if any company should be forced to undertake individually the study and research work on the dust problem that the St. Joseph Lead Company has experienced during the last few years, (and it will be necessary if there is no one place that industry can go for advice), the annual contribution outlined above would seem negligible.

Appreciating that the Air Hygiene Foundation is a new organization and consequently will have many difficulties to overcome, I do not feel that you are justified at this time in urging members of the Lead Industries Association to contribute for over one year's membership, but I definitely feel that it would be an excellent investment on the part of all of us to actively support the Foundation for the year 1937 on a financial basis, as well as by giving the full cooperation of those members of our industry who are familiar with this pressing problem.

With kindest regards, I am

Sincerely yours,

ANDREW FLATCHER (SIGNED)

Vice President and Treasurer.