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PPG INDUSTRIES

PPG INDUSTRIES, INC./ONE GATEWAY CENTER/PITTSBURGH, PENNSYLVANIA 15222/AREA 412/434-3719

February 14, 1972

ELMER C. LARSEN, Vice President  
General Manager, Coatings and Resins Division

Dr. Charles C. Edwards, Jr.  
Commissioner  
Food & Drug Administration  
5600 Fishers Lane  
Rockville, Maryland 20852

Subject: Lead Content of Consumer Paint Products

Dear Dr. Edwards:

This letter presents the position of our company with regard to the lead content of paints manufactured for use in and around the home. The recent meeting of several members of your staff with representatives of the coatings industry at the National Paint and Coatings Association headquarters in Washington indicated the need to supply details of new information which bears upon the subject.

Let me emphasize at the outset that the statements below are made in the framework of a total desire on my part to direct the future composition of all our "household" paints so as to completely eliminate all use of lead chemicals. In only two product lines (and only by force of absolute need for reasons of highest quality) do we use lead pigments in paints presently manufactured.

The practical problem for the near future is the need for research to eliminate the low ratios of lead siccatives or "driers." These are unique in the function of uniformly hardening a film. (Such driers contribute 0.18 to 0.4% lead with the averages weighted to 0.3 to 0.4%.) For years we have searched for substitutes and alternates to accomplish the identical effect without lead driers. While we are partially successful, we still encounter sacrifices in

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quality in many cases. This is a problem common to our industry, and our company is not willing to compromise quality to the consumer. I would emphasize that cost increases of the reformulated alternates are not a consideration.

With the appearance of certain bills, which for the future prescribe lead levels as low as 0.06%, we accelerated our research to completely eliminate lead driers. Only in this way, can we approach this value as we are to a degree circumscribed by the presence of lead as impurities in commercial raw materials over which we have no control.

We have every confidence that in 1974-1975 we can produce all trade sales products with formulations which do not include lead driers. Certain unresolved questions do require research skills of the highest order, followed by enough elapsed time to confirm endurance, container stability, subtle interaction of untried substitutes and raw materials, plus normal expectations with respect to application properties, appearance and color effects. The scope of this work will be appreciated by the fact that we have some 212 products in the catalog plus 6410 additional colors which are prepared from these at the point of sale.

One example of a present imponderable is an oil based paint demanded by the climatic conditions in the Southeast and Southwest regions. Lead driers are the only means to avoid a condition called moisture flatting, and after years of deliberate search we have not as yet been able to demonstrate clues to alternate solutions.

Another problem is the fact that driers have a varying tendency to be absorbed by other ingredients during storage, whereupon the paint fails to dry. In this regard also substitutions of non-lead driers can alter the application properties, resulting in sagging, running or stringiness.

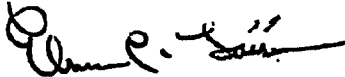
The above facts, of course, refer to paints formulated by our company, but it is my belief that in a qualitative way I have described problems which are common to the total segment of the industry concerned with consumer products for on-site application.

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The magnitude of our problem can be understood by the fact that the time required to shift production from our present formulating practices is a minimum of six months after laboratory proof of the new formula. We feel that it will be early 1973 before we can complete our research programs on the elimination of lead driers on all interior paints, and it will take until January of 1974 to complete the work on exteriors, since we have more oil based products in the exterior line. Therefore, we respectfully request your support of our petition to extend the dates for full conversion of the production of interior finishes at the 0.06% lead level until January, 1974, and for exterior finishes until January, 1975. You can be sure that we will take steps to introduce the new products as soon as possible.

We are prepared, on short notice, to present the facts with respect to the above problems.

Sincerely,



Elmer C. Larsen

cc: R. A. Roland - NPCA

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