



Office File

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MF-620

MAIL ROOM
NOTED & VERIFAXED

Wilmington, Delaware
October 26, 1962

C. O. DAVISON

FEDERAL HAZARDOUS SUBSTANCES LABELING ACT

Reference: C.W.S.'s 8-16-62 to C.O.D.

In C. W. Shay's 8-16-62 he called attention to the possibility of special labeling requirements for lead containing Colorants under the Federal Hazardous Substances Labeling Act. The problem existed because it was not known whether the lead content of certain of our Colorants was sufficiently high to classify them as toxic under the regulations to the Act.

The Haskell Laboratory has completed oral ingestion tests on Colorants 12, 13, 14, 15 and 30, and, on the basis of these tests, reports that none of the materials are toxic under the law. They suggest, however, that special labeling may be required because of the solvent content of Colorants 13, 14 and 30. This problem has already been resolved by the "blanket" exemption from petroleum distillate labeling for paints with viscosities greater than 150 S.S.U., since all of our Colorants are relatively viscous materials.

In view of the test results and the comments above, it will not be necessary to use special labeling for Custom Color Colorants.

F. T. JOHNSON

FTJ:s