

Mr. W. D. Kinsell
Mr. J. E. Peters
Mr. G. Bechtel
Mr. S. T. Bowell, DWJ
Mr. E. B. Buchner
✓ Mr. W. Tomc

W. T. TOMC
FEB 21 1972

W. TOMC
FEB 21 1972

February 15, 1972

Dr. Charles C. Edwards
Commissioner F.D.A., Dept. H.E.W.
5600 Fishers Lane
Rockville, Maryland 20852

Dear Dr. Edwards:

Last week I had the privilege to be present at discussions which included FDA personnel. The subject of this meeting centered around lead content in architectural finishes. It was my impression that some aspects of the situation were not entirely clear and others have not been made as evident as they might be.

Our company supports the objectives of the FDA proposal as published in the November 7, 1971 Federal Register and has expressed this attitude before the Hearing Clerk in the Department of Health, Education & Welfare. It is the company's long-standing position that the 0.5% lead level is proper as it presents no hazard to the public, and we have reformulated our interior architectural products to meet the 0.5% lead content restriction. In meeting this regulation we have removed all lead-based pigments which constitute the major lead-bearing constituents of such coatings. This reformulation program has resulted in a position that we now manufacture over 71% of our interior architectural coatings gallonage with no added lead content other than inadvertent contaminants in raw materials. The remaining 29% of our gallonage contains only lead drier compounds resulting in less than 0.5% lead content but more than 0.06% content.

Present alkyd resin and drying oil based coatings are those which still require the use of small amounts of lead driers to adequately perform after shelf-aging and under cool, humid conditions. In this group are floor enamels, and general purpose interior alkyd coatings.

In view of pending legislation before several state and local governments which we believe is an attempt to coerce

GLD012602

Dr. Charles C. Edwards
Commissioner F.D.A.

- 2 -

February 15, 1972

or force the industry to accept a standard somewhere between Congressman Ryan's 0% level and the .5% level proposed by the FDA, we wish to assure you that a diligent and concerned major effort is in progress to reformulate this remaining portion of our architectural products. Our objective is less than 0.06% lead content but to still provide an adequate product to the consumer. An obvious objective here is reformulation with lead substitute drier compounds in which we have complete confidence of proven non-toxic qualities.

We respectfully seek your consideration and support in obtaining a year in which to accomplish this objective of reducing the lead content of these interior architectural products to less than 0.06% lead content.

Yours very truly,

HJKiefer
JEP
d

Director of Research and
Development
Coatings and Resins Group
GLIDON-DURKEN
Division of SCM Corporation

GLD012603