

2. Regulations -- MASSACHUSETTS *LEG. BULL 13 7-9-73*

Due to substantial practical marketing problems, increased costs and inconvenience to customers, NPCA and its members have questioned the requirement that certain products exempt from the Massachusetts lead regulations (automobile refinishes, industrial and commercial maintenance products, etc.) be marketed only in containers of two gallons or more. Massachusetts authorities now are considering a revision to the lead regulation to alleviate this problem.

NPCA also is continuing to question the following issues raised by the Massachusetts lead regulations:

- 1 - The special labeling (e.g. Poison statement) required by the Massachusetts lead regulations, especially in light of Federal presumption of labeling for products covered by the Federal Hazardous Substances Act?
- 2 - The reporting requirements of the regulations (which were to have been complied with by July 1, 1973) and the extent to which these provisions require lead content data for individual products?
- 3 - The impact of the exemption for "original finish paints" on coatings used in the original equipment manufacturing of appliances, air conditioning units, heating units, etc., which may be used in households?

In an attempt to obtain some accommodation on these issues, NPCA has arranged a meeting on July 10, 1973, with appropriate Massachusetts officials. Further developments will be reported as occurring.

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