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INTER-OFFICE LETTER

FROM AWSTC - Chicago #75

Technical Manager
Industrial Maintenance
Coatings

DEPT

FOR See Last Page

OFFICE

DATE May 15, 1972

MR.

SUBJECT FDA Proposed Lead Regulations

REFER TO LETTER OF

DICTATED BY

FDA PROPOSED LEAD REGULATIONS

As you know because of recent proposed FDA Regulations there is a program in effect to reduce lead and/or toxic heavy metal content of all Professional Coatings and Trade Sales price list items, with the exception of Industrial Maintenance.

However, since we do not know how these regulations will ultimately be interpreted we are suggesting the following:

- (1) Consider the use of substitute driers when lead drier or litharge are presently used and other lead pigments are not being used (i.e., Metalastic II).
- (2) Suggest possible replacements of red lead or basic lead silico chromate (primers).
- (3) Summarize your position as to what can be done to formulate a relatively non-toxic primer keeping in mind that chromates may be curtailed in the future.

At this time we do not need to make formulation changes but the purpose of this letter is to develop information and to stimulate your thinking, so as to protect ourselves from being caught unprepared against potential restrictions.

Attached is a list, by laboratory, of the products to be considered.

0007-SWP-038210

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Our approach:

Phase I

- (1) Do you already have any information on lead free alternate formulas? How do they compare to lead containing line items? How are properties effected by lead removal, i.e., Tile Clad II and C&M primer without lead pigment?
- (2) Have you looked at alternate inhibitive pigments such as Zinc oxide, zinc molybdate, Busan, zinc dust, etc?
- (3) What other approaches can we take i.e., increasing chemical resistance of vehicle?
- (4) How tolerant are Zinc Rich coatings of a lesser degree of surface preparation i.e., Zinc Clad 5? This may be an approach in case our inhibitive primers are severely restricted.

Phase II

Develop and evaluate lead free alternates in case we need to make a change. Remember — we said develop not revise.

We would appreciate your comments.

0007-SWP-038211

0007-SWP-000110392

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INDUSTRIAL MAINTENANCE

PRODUCTS

CONTAINING LEAD AND HEAVY

METALS

Chicago

Galvanized Iron Primer		B50 A 1
Ken Bond Primer		Eh1 H 15
Kromik Primer		Eh1 H 1
Tankelad	Light Gray	B69 A 26
	Medium Gray	B69 A 27
	White	B69 W 27
AWWA Vinyl System		E90 E C3

Morrow

Metastatic II

Ken A&A Black B69 B 1 and Green B69 G 9

Cleveland

Hi-Hide Metal Primer		B50 H 5
Ken Kromik Primer		B50 H 2
Zinc Chromate Primer		B50 Y 1
Tile Clad II Primer		B69 H 70
Tile Clad II Safety Colors		
	Alert Orange	B69 E A4
	Safety Green	B69 G A59
	Fire Protection Red	B69 R A 15
	Hi-Visibility Yellow	B69 Y A3

Garland

G&M Primer		B69 H 11
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Emulsion

Metalatex Metal Primer

B51 E C1

Directed to:

R. F. Davidson - Garland

O. G. Davies - Cleveland

R. H. Hille - Emulsion-Chicago

T. K. Hay - Paint Research

J. F. O'Kelley - Morrow

D. T. Werkman - AWSTC

A. Paltz - Newark

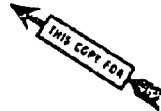
J. Oscarson - Oakland

H. Henion - Detroit

S. G. Conley - Gibbsboro

Carbon copies:

WESpitzer, RAMoore, OKSieplein, RLCollins, WTCehring, GGSchurr, ESBrotzman,
FCBertsch, CJBerg, PEP Perkins, AAbbott, EMHouseholder, JJLenzotti, JHLinden



L. J. Nicholas
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Technical Manager
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0007-SWP-038213