

INTER-OFFICE LETTER

FROM Cleveland

OFFICE Research Admin. 1000

FOR

OFFICE

DATE October 13, 1971

ON

SUBJECT Ecology

REFERS TO LETTER OF

DICTATED BY

In the April, 1970 Management Information News & Views bulletin, Mr. W. O. Spencer wrote -

"Improvement of Environment Is A Corporate Goal"

"As a responsible corporate citizen, Sherwin-Williams is vitally concerned about the quality of the environment and is taking positive steps to improve it."

While in this statement Mr. Spencer's thoughts were directed primarily at air and water pollution, the statement does represent the corporate posture in all areas of environmental improvement.

We accept as a social responsibility that our products be designed to improve, not degrade, man's environment. Within the limits of our knowledge, this must be our policy in compounding the products we sell.

New laws, regulations and guidelines are being issued literally daily. We have established procedures and organization to be as currently aware of these as is humanly possible. Where these affect us, every effort is made to bring them to the attention of those who need to know. It is, of course, impossible and hopefully unnecessary to communicate everything to everybody.

It seems timely to re-state our position on a number of major areas. My comments are directed to product rather than processes.

Air Pollution. -

Most Trade Sales and Professional Coatings should now be in compliance with hydrocarbon oxidant regulations such as Los Angeles Rule 68K. There are some products we have not been able to reformulate to comply and which cannot be sold where regulations are in effect. The total volume of the products involved is relatively small and the contribution to the total air pollution is minimal. As more states and cities set up air pollution standards and controls, as required by EPA regulations, these few products will phase out and be replaced.

Lead. -

Existing and proposed restrictions on lead content in paint are primarily directed to those used in the household; i.e., Trade Sales and Professional Coatings for use on residential.

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Lead (Cont'd)

While very few regulations have actually issued, all indications are that the following must be our schedule in eliminating lead as a major hazard.

Exterior Residential Paints - SWP, Transparent Stains, etc.

January 1, 1972 - Maximum 1% Lead

January 1, 1973 - $\frac{1}{2}$ % Lead (1)

Interior Residential Paints - Non-Glo, All Surface Enamel, etc.

January 1, 1972 - Maximum $\frac{1}{2}$ % Lead

July 1, 1972 - 0% "added lead" (2)

Fortunately many items in our Trade Lines already conform to these limits.

- (1) Work is underway to attempt to reach a 0% "added lead" level by this date.
- (2) "Added lead" is defined as the addition of lead compounds as catalysts, etc. and does not include lead contaminants that might be present in inerts, pigments, etc. Sketchy evidence would indicate that lead so introduced will be 0.01% to 0.1% - well within all known proposed restrictions.

Mercury. -

Our position here is clear. No mercurials are to be used as paint additives.

These policies will affect our formulating approach in many instances. Each central lab must make certain that all of their products comply. If there are instances where compliance is impossible or will require cost increases, make certain that these are brought to our attention.

Even though a formula is designed to be in compliance, our responsibility does not cease there. The final product as it is sold to the consumer is what must conform. We need, therefore, to communicate properly to the manufacturing personnel that special care in the production of these items is required. Proper manufacturing procedures will have to be such that contamination with inadmissible materials from previous batches, improper substitutions, and the use of the wrong shading base are avoided.


H. E. Spitzer
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DES:AN

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