

FROM G. L. Bechtel DATE May 8, 1972 FOR Distribution Below
CITY Cleveland - #30
ANSWERING
LETTER OF
SUBJECT GLIDDEN TRADE SALES POLICY--LEAD IN PAINT

This information is being disseminated to provide up-to-date facts for our field sales force and customers on the status of federal lead in paint legislation and our official and technical position.

The Food and Drug Administration (FDA) has published regulations requiring all paint products intended for use in or around the household to be at a lead level not exceeding .5% (1/2%) by January 1, 1973. All products with a higher percentage can not be moved in interstate commerce after that date. One year subsequent, January 1, 1974, all products must be down to .06% (6/100%) or less lead content. It is important to note the impending laws prohibit only interstate movement. At present both our customers and ourselves have every legal right to sell products at higher lead levels.

We recognize there is a great deal of conflicting data over what is, or is not, safe levels for lead in wet or dry paint films; and, in fact, the paint industry through its trade association may legally contest some aspects of the new regulations. However, we consider such legislation as the FDA ruling to be in the good interest of the public and Glidden Trade Sales will seek and accomplish full compliance with all such laws.

At present most of our products already are at/or below the .5% level. Only a handful of our products used in and around the house do not now comply and all such formulas are being promptly adjusted. Judging from letters received by the FDA in February, written by many of our competitors, our present product position appears quite favorable.

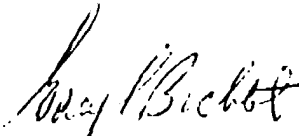
Further, it is our goal to meet a .06% or less lead level in all paint products intended for use in or around the household by January 1, 1973, one year ahead of the current FDA ruling. Priority assignments have been given to our research center, and we see no major difficulty in achieving our target goal and date. In all honesty, however, certain products, and/or colors, can not be adjusted and will be discontinued due to lack of suitable alternate raw materials. Simply, technology does not exist.

Because the newly developing local, state, and federal laws will prohibit interstate movement of banned products, we ask that each field sales and management representative to encourage the following action:

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- Attached is a complete list of reasonably recent history product codes which exceed the .5% lead level. Between now and January 1, 1973, every effort must be taken to rid all dealers' stocks and our own unit stocks of the non-compliance products, particularly those items dating back four or five plus years. Each salesman is responsible to contact all former dealers not now doing business with us and provide information on products the dealer should dispose of. Such action combined with our research, production, and distribution of compliance products will help to insure that all Glidden products everywhere are within legal limits on January 1, 1973.
- Within the next 90 days, we will distribute complete data on all current Y-line products and their status regarding the legislation.

If all field sales and management personnel will follow this directive in the spirit intended, our customers and the company will minimize problems that are inherent with all such sweeping legislation. However, once again--your company will achieve full compliance and we will use the written performance objectives at all levels of personnel to accomplish this objective. Questions should be directed to me.



GARY L. BECHTEL

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Attachments

Distribution:
Z-14
Z-27 (include salesmen)
Z-38 (include salesmen)
Z-30
Z-39
Z-49
Z-42
Z-50

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INACTIVE PRODUCTS CONTAINING LEAD

<u>Y-Number</u>	<u>Product</u>	<u>Dates Active</u>	<u>Relabel No. or 85 Line No.</u>
Y-64	Japan Driers	1946-1966	
Y-120	Implement Tractor Yellow	1956-1962	
Y-478	Rustmaster Suntone	1959-1967	Y-4560
Y-480	Rustmaster Greenfield	1959-1967	Y-4554
Y-481	Rustmaster Flare Red	1959-1967	Y-4556
Y-506	Red Lead	1940-1966	85-R-114
Y-582	Neva-Rust Red	1942-1960	85-R-13
Y-843-B	Craftsman Florenamel Tile Green (now lead free)	1965-1968	
Y-1212-E	Bud Green	1945-1959	
Y-1230	Lemon Yellow	1945-1960	
Y-1252	Japalac Orange	1945-1961	
Y-1254	Japalac Empire Green	1945-1960	
Y-1704	COLORS IN OIL		
Y-1705	" " "	Dark Chrome Green	1926-1963
Y-1706	" " "	Medium Chrome Green	1926-1965
Y-1707	" " "	Light Chrome Green	1926-1965
Y-1716	" " "	Medium Chrome Yellow	1926-1965
Y-1716	" " "	Light Chrome Yellow	1926-1965
Y-1742	" " "	Dark Chrome Yellow	1926-1965
Y-1828-S	Crylite Green	up to 1963	
Y-1886	Light Canary	1960-1967	
Y-4454	Q.D. Medium Green		
Y-4465	Q.D. Bright Red		
Y-4552	Speedenamel Orange		85-Y-121
Y-4555	" Garnet Red		
Y-4556	" Fire Red		85-R-145
Y-4559	" Lt. Yellow		85-Y-122
Y-4566	" Lt. Green		85-G-133
Y-4567	" Yellow Gold		85-Y-49
Y-4568	" Burnt Orange		85-Y-50
Y-4574	" School Bus Yellow		85-Y-63
T-4740	Speedwall Chartreuse	1954-1959	
Y-4741	" Lemon	1954-1958	
Y-4744	" Hibiscus	1954-1959	
Y-4759	" Asparagus	1954-1958	
Y-4769	" Green Pearl	1954-1958	
Y-5088	Stadium Seat Enamel	1958-1959	Y-4554

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<u>Y-Number</u>	<u>Product</u>	<u>Dates Active</u>	<u>Relabel No. or 85 Line No.</u>
Y-5092	EZC Machine Enamel - Lt. Green	1957-1961	
Y-5094	" " " - Red	1954-1964	Y-4565
Y-5096	" " " - Surf Green	1957-1961	
Y-5202	EZC Pipe Enamel - Orange	1958-1964	Y-4552
Y-5203	" " " - Yellow	1958-1964	Y-4560
Y-5204	" " " - Green	1958-1964	Y-4554
Y-5205	" " " - Red	1958-1964	Y-4556
Y-5215	LifeMaster Primer		304-D-1
Y-5247	Nu-Pon Cote - Red	1961-1964	85-R-89
Y-5267	Vyn-Al Medium Red	1961-1964	85-R-90
Y-5287	Vinyl-Cote Medium Red	1961-1963	85-R-74
Y-5294	Vinyl-Cote - Ship Bottom Red Lead	1961-1967	178-R-1
Y-5295	Vinyl Cote - Ship Bottom Red Lead	1961-1967	178-R-2
Y-5296	Vinyl-Cote - Ship Bottom Brown Lead	1961-1967	
Y-5297	Vinyl-Cote - Ship Bottom Red Anti-Fouling	1961-1967	178-R-3
Y-7102	Silk Screen - Red		85-R-107
Y-7103	" " - Bright Red		85-R-108
Y-7104	" " - Lemon Yellow		85-Y-78
Y-7105	" " - Chrome Yellow		85-Y-79
Y-7106	" " - Medium Green		85-G-94
Y-7115	Silk Screen - True Yellow		
Y-7133	" " - Yellow Green		
Y-7146	" " - Yellow Green		
Y-7179	Sign Enamel - Red		85-R-44
Y-7181	" " - Chrome Yellow		85-Y-39
Y-7182	" " - Primrose Yellow		85-Y-38
Y-7183	" " - Medium Green		85-G-46
Y-7207	Silk Screen - Dark Green		85-G-95
Y-7208	" " - Emerald Green		85-G-96
Y-7212	" " - Vermilion		85-R-110
Y-7213	" " - Red		85-R-111
Y-7214	" " - Orange		85-Y-80
Y-7215	" " - Primrose Yellow		85-Y-81
Y-7216	" " - Lemon Yellow		85-Y-67
Y-7217	" " - Chrome Yellow		85-Y-82
Y-7219	" " - Bright Orange		85-Y-68

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<u>Y-Number</u>	<u>Product</u>	<u>Dates Active</u>	<u>Relabel No. or 85 Line No.</u>
Y-7235	Silk Screen - Emerald Green		85-G-51
Y-7236	" " - Vermilion		85-R-53
Y-7237	" " - Bright Red		85-R-54
Y-7238	" " - Lemon Yellow		85-Y-44
Y-7253	" " - Poppy Orange		85-Y-40
Y-7254	" " - Primrose Yellow		85-Y-41
Y-7255	" " - Lemon Yellow		85-Y-42
Y-7256	" " - Med. Chrome Yellow		85-Y-43
Y-7257	" " - Emerald Green		85-G-47
Y-7258	" " - Bottle Green		85-G-48

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