Lead Industries Association

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MANFRED BOWDITCH
DIRECTOR OF HEALTH AND SAFETY

February 23, 1960

Robert A. Kehoe, M.D., Director
Kettering Laboratory of Applied Physiology
University of Cincinnati
College of Medicine
Eden Avenue
Cincinnati 19, Ohio

Dear Bob:

By way of making a start on what you should have as a basis for formulating municipal regulations with regard to "paints that may be chewed by children," herewith are (1) a copy of a letter received from Dan Ring of the National Paint, Varnish and Lacquer Association on Friday, (2) copies of the three of his enclosures which I have in multiple, (3) a copy of a statement prepared for the February 24th meeting of the ASA Z66.1 Subcommittee by Mr. Lyman P. Hunter of Salt Lake City, (4) a copy of the call for the meeting, to give you an idea of "what's cooking," and (5) a copy of the Z66.1 - 1955 Standard currently under revisionary discussion.

You will, I think, find Mr. Ring's "Report on Precautionary Labeling" particularly worth reading. As he indicates, uniformity as between jurisdictions is vastly more important to the affected industries than is the actual wording of the precautionary labels themselves. Very much off the record, the particularly obnoxious fly in the ointment of uniformity is our friend H. Williams.

For my money, Dan has a broader and better understanding of this whole business than anyone else I know. I think he could be very helpful to you, and when I see him tomorrow, I will sound him out as to the chances of his getting out to Cincinnati.

Sincerely,

MB:es
enc.

February 17, 1960

Mr. Manfred Bowditch
Lead Industries Association
60 East 42nd Street
New York 17, New York

My dear old Diaskeuast:

Let me thank you for the suggestions in your letter of February 15. Unless Mr. Hoover disagrees, the substance of them will be included in our report because I feel that they will do a lot to improve the whole document.

I am taking the opportunity to enclose herewith an original and two copies of my report on precautionary labeling. Our mimeograph section is just jammed to the N'th degree at the present time or I would have provided a mimeographed series for each member of the committee. I am enclosing with the report sufficient copies of our present recommended precautionary labels which were approved in 1954 and which have been used by the great majority of our members ever since that time. As I say in the report, when the new revisions are complete, which will be within the next 60 days, I will be happy to distribute the same to all members of our subcommittee.

I also enclose for use with the report 15 copies of the proposed hazardous substance bill introduced in the Senate by Senator Magnuson which, as I remarked in my report, follows closely the model bill of the CSMA and MCA. Everybody is short of copies of the model bill but I enclose one we have here in our office so that you may see what it looks like. This bill, of course, was approved primarily for use in state legislatures. In the State of New Jersey, a bill has recently been introduced that follows a model bill which we had prepared and will use whenever the legislature wishes to restrict its attention to paint rather than hazardous substances generally. I enclose a copy of our model state paint labeling act.

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[redacted] ary 17, 1960

I hope that I am not becoming too burdensome in supplying all this data. I think you as the Secretary should always have it in the files at least, and you should use your own discretion about distributing the precautionary labels, which we now know will shortly be revised, and the copies of the Senate Bill on hazardous substances.

John Foulger and I will arrive Tuesday night, February [redacted]. We have reservations at the Waldorf.

With very best wishes, I am

Sincerely yours,

Daniel S. Ring
General Counsel

DSR:ew
Enclosures

3 cc. Report on Precautionary Labeling. D.S.R. (typed)

10 cc. Precautionary Labels Recommended by the N.P.V.L.A. for Paints Containing Metal Compounds, Solvents of Specified Flash Points or Significant Amounts of Other Materials which May Be Harmful. Oct. 1, 1954. (mimeo.)

16 cc. S.1283, 86th Congress, 1st Session. Magnuson.

1 c. Hazardous Substances Labeling Act. N.P.V.L.A., Jan. 5, 1959. (mimeo.)

1 c. State Paint Labeling Act. N.P.V.L.A., Jan. 29, 1959. (mimeo.)

KE 0006262

Report on Precautionary Labeling

General

I have been requested by the Z66 subcommittee of the American Standards Association to summarize precautionary labeling legislation with respect to laws and regulations applicable to paint products on municipal, state and federal levels.

Precautionary labels are one of the two large general divisions of labeling regulations that are in effect in the country. The other division is what is known as formula labeling. The distinction is that precautionary labels are aimed at protecting the public from harm through the improper use of products, while the formula labels protect retail purchasers against fraud and deceit with respect to the nature of the product bought and sold.

Formula Labeling

Formula labeling requires the statement of the ingredients of a product to be placed on the label. This informs the purchaser what he is buying and he can compare any particular can with any other.

The states now requiring formula labeling are Alabama, Iowa, Minnesota, Mississippi, Montana, Nebraska, North Dakota, South Dakota, Vermont, Virginia and Wyoming.

Precautionary Labeling

Precautionary labels are subject to two large subdivisions. One applies to paints and paint products exclusively; the other applies to all hazardous household products, which includes but is not limited to paints and paint products.

States with laws on hazardous substances are California, Colorado, Hawaii, Illinois, Indiana, Kansas, Massachusetts, New Jersey, New York, Ohio, Oregon, Texas and Vermont. These hazardous products laws relate generally to retail sales and do not seek to bring under their jurisdiction industrial transactions which do not involve a marketing of the product as such to individual members of the public.

The following states have labeling statutes limited to paint products as such: Alabama, California, Georgia, Illinois, Iowa, Kansas, Massachusetts, Minnesota, Mississippi, Nebraska, North Dakota, Ohio, Pennsylvania, South Dakota, Vermont, Virginia and Wyoming.

In many of the states there are both hazardous household products laws and regulations as well as paint labeling laws. In some instances this overlap is taken care of by excluding paints from hazardous household product acts where special provisions have been made for paint.

City Ordinances

The cities of New York, Buffalo and Baltimore have special municipal ordinances relating to paint. The Fire Department in New York has one set of regulations to protect against the hazards of flammability and combustibility, while in the same city the Health Department has other regulations under its Sanitary Code to protect the health of its citizens.

The Recommended Labels

In 1954 the National Paint, Varnish and Lacquer Association adopted recommendations for labels which followed, in marked degree, the American Standards Association Z66.1 standard on lead and other harmful substances in paint. The recommended labels of the National Association, however, went even further and embraced the hazards of flammability and combustibility

even in paints where there was no harmful ingredient present with respect to ingestion or inhalation.

I append a set of these recommendations hereto with the general statement that they cover practically all states having both hazardous household products involved and special paint laws. Just this year, however, the National Paint, Varnish and Lacquer Association revised its recommendations by adding the recommended phrase "Keep Out of Reach of Children" for all labels and by emphasizing the requirement to use all products "with adequate ventilation".

The new recommendations are not ready for distribution but as soon as they are, they will be distributed to each member of this subcommittee.

Uniform Warning Wording

We are currently engaged in a project to seek standardization and uniform wording for warnings in ordinances in New York, Baltimore and the rest of the country with respect to paints containing more than 1% lead. The Baltimore label required for paint containing more than 1% lead reads as follows:

> "WARNING - Contains Lead. Harmful if Eaten. Do not apply on any interior surfaces of a dwelling, or a place used for the care of children, or on window sills, toys, cribs and other furniture."

The New York requirement for a lead paint warning label is:

> "Contains Lead. Harmful if Eaten. Do not apply on toys, furniture or interior surfaces which might be chewed by children."

In the event that an agreement can be reached between the Baltimore and New York authorities as to the wording, the proposed recommended label for combustible paint products with a flash point above 80°F. will read:

"CAUTION, COMBUSTIBLE. Keep away from heat and open flame. Contains Lead or other compounds harmful if eaten. Do not apply on toys, furniture, window sills or other interior surfaces of rooms used by children. Avoid breathing vapor or spray mist. Avoid prolonged contact with skin. Wash thoroughly after handling and before eating or smoking. Keep container closed when not in use. Keep out of the reach of children. Use with adequate ventilation."

This label takes care of both the requirements of the Health Department of New York City with respect to harmful ingredients, and with the requirements of the Fire Department of New York City with respect to combustibility or flammability. With the addition of the words "Keep out of reach of children", which is a new phrase, we believe that this label once cleared by Baltimore and New York will be acceptable in all states and other municipalities requiring lead paint warning labels as well as in all states with hazardous household product laws.

Federal Legislation

There is pending on Capitol Hill Senate Bill 1283, introduced by Mr. Magnuson, which closely follows the labeling requirements of the model bill prepared by the Manufacturing Chemists Association and the Chemical Specialties Manufacturers Association, copy of which is here enclosed. During the last few years, eight states have adopted in substance the provisions of this model bill. The American Medical Association participated in preparing the draft. For use in states as distinguished from the federal government, our Association has approved its terms as being acceptable to the paint industry whenever a state legislature decides that a paint labeling law is desirable.

Conclusion

We have 50 states, the District of Columbia, Puerto Rico and the Virgin Islands which can each adopt precautionary labeling. We have dozens of cities who are interested in protecting their citizens by having products properly labeled, and now we have the federal government working on the same proposition.

The paint industry asks only for an opportunity to cooperate in a practical, effective and reasonable way in labeling its products to protect the public against harm to its health and against fraud from "gyp" and "fly-by-night" entreprenеurs.

Time and again I have heard manufacturers whose labeling cost them many, many thousands of dollars each year say: "We want strong and effective and truly protective labels. We want fully to cooperate with our public health authorities, our municipal authorities and our states in providing proper labels. There is only one thing that we ask, that to the extent humanly possible the wording on labels be made uniform."

It is only by reaching as far as possible toward the goal of uniformity in labeling that we can provide without undue hardship the protection to which the public is entitled. The converse would be a requirement in its worst sense of differing labels for 50 states and as many cities. I hope that each of you can see his way clear to support us in our fight for uniformity in warning labels.

Respectfully submitted,

Daniel S. Ring
National Paint, Varnish and
Lacquer Association, Inc.

PRECAUTIONARY LABELS RECOMMENDED BY THE NATIONAL PAINT, VARNISH AND LACQUER ASSOCIATION FOR PAINTS CONTAINING METAL COMPOUNDS, SOLVENTS OF SPECIFIED FLASH POINTS OR SIGNIFICANT AMOUNTS OF OTHER MATERIALS WHICH MAY BE HARMFUL

The following precautionary labels are suggested for use by members of the paint, varnish and lacquer industry.

The principles set forth in the suggested labels apply to all types of containers, large and small.

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Precautionary labeling for paints containing harmful metal compounds should be applied to groups as indicated.

GROUP I - Products containing not more than 1 percent of lead, as metal (Pb), and not containing compounds of antimony, arsenic, cadmium, mercury, selenium, or barium (when soluble by stirring for 10 minutes with 5 percent hydrochloric acid at room temperature) introduced as such in the formulation of these products, and a solvent flashing below 150°F.

Flash Point above 80°F.	CAUTION! COMBUSTIBLE Keep away from heat and open flame. Use with adequate ventilation. Avoid prolonged or repeated contact with skin. Avoid prolonged breathing of vapor or spray mist. Keep container closed when not in use.
Flash Point above 20°F. to 80°F., inclusive	WARNING! FLAMMABLE Keep away from heat, sparks, and open flame. Use with adequate ventilation. Avoid prolonged or repeated contact with skin. Avoid prolonged breathing of vapor or spray mist. Keep container closed when not in use.
Flash Point 20°F. or below	DANGER! EXTREMELY FLAMMABLE Keep away from heat, sparks, and open flame. Use with adequate ventilation. Avoid prolonged or repeated contact with skin. Avoid prolonged breathing of vapor or spray mist. Keep container closed when not in use.

(a) "Do not take internally" may be omitted from Group I except in the case of clear liquids, such as thinners. Regardless of flash point, these clear liquids should bear appropriate Group I label plus warning "Do not take internally", because clear liquids may be attractive nuisances or mistaken for beverages.

(b) Flash point determinations, in all cases, refer to Tag. Open Cup Method, as specified in ASTM Method D 1310-54T.

(c) Products classified in Group I which contain "odorless" solvents must be labeled with the appropriate Group I labels, but the warning words "Use with adequate ventilation" must be in type two points larger than the type used for the rest of the appropriate caution label and the label placed in a prominent position on the container.

(d) The percent of lead is determined as lead metal (Pb) based on the total solids of the paint.

GROUP II - Products containing more than 1 percent of lead as metal (Pb) in a compound (see Note (b) below), or containing a compound of antimony, arsenic, cadmium, mercury, selenium or barium (when soluble by stirring for 10 minutes with 5 percent hydrochloric acid at room temperature) introduced as such in the formulation of these products, and containing solvents of the following flash points:

Flash Point above 80°F.

CAUTION! COMBUSTIBLE
Keep Away From Heat and Open Flame
CONTAINS LEAD OR OTHER COMPOUNDS HARMFUL IF EATEN

Do not apply on toys, furniture or interior surfaces which might be chewed by children. Use with adequate ventilation. Avoid breathing vapor or spray mist. Avoid prolonged contact with skin. Wash thoroughly after handling and before eating or smoking. Keep

Flash Point above 20°F. to 80°F.

WARNING! FLAMMABLE
Keep Away from Heat, Sparks, and Open Flame
CONTAINS LEAD OR OTHER COMPOUNDS HARMFUL IF EATEN

Do not apply on toys, furniture or interior surfaces which might be chewed by children. Use with adequate ventilation. Avoid breathing vapor or spray mist. Avoid prolonged contact with skin. Wash thoroughly after handling and before eating or smoking. Keep container closed when not in use.

Flash Point 20°F. or below

DANGER! EXTREMELY FLAMMABLE
Keep Away from Heat, Sparks, and Open Flame
CONTAINS LEAD OR OTHER COMPOUNDS HARMFUL IF EATEN

Do not apply on toys, furniture or interior surfaces which might be chewed by children. Use with adequate ventilation. Avoid breathing vapor or spray mist. Avoid prolonged contact with skin. Wash thoroughly after handling and before eating or smoking. Keep container closed when not in use.

(a) The percent of lead is determined as lead metal (Pb) based on the total solids of the paint.

(b) When more than 1 percent of lead is the only harmful compound used in the product, the words, "Contains lead or other compounds harmful if eaten" in the applicable Group II label may be changed to "Contains more than 1 percent lead (Pb)". Furthermore, when this wording is used, the words "Harmful if eaten" must appear in the text of the label.

GROUP III - Products other than those included in Group II containing significant amounts of materials or solvents which may be harmful.

When harmful substances, other than those included in Group II are used in paint, due to formulation variables, it is impossible to establish a general warning label. The paint manufacturer is cautioned to alert himself to such hazards and use an appropriate precautionary label.

Extra vigilance should be the rule in labeling harmful Group III products. Labeling of Group III products containing hazardous chemicals to be guided by MCA Manual L-1 Warning Labels applying to those particular chemicals.

GROUP IV - Paint and Varnish Removers

(a) Non-Flammable Removers, such as specified in Federal Specification TT-R-251c Remover; Paint and Varnish (organic Solvent Type), Type II. Such removers containing substantial amounts of Methylene Chloride must bear labels materially as follows:

CAUTION!
Contains Methylene Chloride

Use with adequate ventilation. Avoid prolonged or repeated contact with skin. Avoid prolonged or repeated breathing of vapor. Do not take internally.

(b) Flammable Removers, such as specified in Federal Specification TT-R-251c Remover; Paint and Varnish (organic Solvent Type), Type I. Such removers containing substantial amounts of benzol must bear labels materially as follows:

DANGER! EXTREMELY FLAMMABLE
VAPOR HARMFUL - POISON
Contains Benzol

Keep away from heat, sparks, and open flame. Keep container closed. Use only with adequate ventilation. Avoid prolonged or repeated breathing of vapor. Avoid prolonged or repeated contact with skin.

"PAST HISTORY OF LEAD INTOXICATION AS RELATED TO MODERN PAINT FILMS"

Whenever a hazard involving small children exists, prompt steps should be taken to correct it. However, it is most desirable to pin point the hazard as accurately as possible in order to be sure that corrective efforts are made in the right direction.

In attempting to study the problem of lead intoxication in young children, our most reliable sources of information seem to be medical reports that have been published. Of these, three in particular have been brought to our attention as showing effort and care in documentation. These are as follows:

1. "The Baltimore Study" by J. Julian Chisolm, Jr. M.D., June 1952.
2. "The Exposure of Children to Lead" by J. Julian Chisolm Jr., M.D., and Harold E. Harrison, M.D., published in "Pediatrics", Vol. 18, No. 6, Dec. 1956.
3. "Summary and Excerpts from Passaic County Grand Jury Presentment of January 1959".

There may be other equally well documented studies, but if so, they have not come to our attention.

Three particularly significant facts seem to be brought out by these reports:

1. The greatest hazard seemed to be with children under three years of age.
2. The lead content of composite films where ingestion was suspected or confirmed was usually over 5%.
3. Most cases were from the urban, low income, slum areas.

It is unfortunate that no mention is made in these reports of the form in which the lead was found. Perhaps this was not determined. Nevertheless, simple mathematics plus a knowledge of the history and composition of paint indicates that it would be highly improbable for the major part of this lead to be anything other than "White Lead". Details on this point are discussed later. In any case where the analysis of composite films indicates more than 5% of lead, this would be the case.

If "White Lead" is involved in the cases where lead content is over 5% (which represents nearly all cases) it would not be unreasonable to assume that it is probably involved in the few similar cases where

the lead content was less than 5%.

From a technical point of view, it does not seem reasonable to accept the premise that all lead compounds are alike, and will have equal toxicity. The lead content of glassware and of porcelain glazes is presumed to be free from hazard because of the fact that the lead is tightly held in an unavailable form. We would also expect that the lead content of paint might well be more available in some compounds than in others. An effort to determine whether or not all forms of lead that are used in paint are equally hazardous would seem to be desirable.

In 1940, the U. S. Public Health Service published Public Health Bulletin No. 253 entitled "The Relative Toxicity of Lead and Some of its Common Compounds". This was an animal study, and is not claimed to be conclusive. Nevertheless, we have the following statement on page 27, "However, careful consideration of the data in the above experimental work indicates that while no exact numerical order can be assigned to the toxicity, certain lead compounds may be set apart as more toxic than others".

It is recognized that animal studies may not be directly applicable to problems connected with small children. The above is cited simply to support the statement that all lead compounds are probably not alike in toxicity. As another example of how metallic compounds may vary in toxicity, we might contrast the effects of barium chloride and barium sulphate.

There are three general classes of lead compounds used in the paint industry. One is "White Lead". The second consists of a group of color pigments whose essential lead component is lead chromate. A third possible classification is that of lead driers. However, the concentration of driers in paint films is probably too low to be significant.

Although "White Lead" probably should only refer to basic lead carbonate, basic lead sulfate is also used in exterior paints and is often called "White Lead". Both of these compounds carry lead in an easily available form. The "Basic" portions of both compounds as well as the carbonate portion of the "Basic Carbonate" are easily converted to lead chloride by stomach acids.

As stated "White Lead" is used in exterior paints at the present time. Its concentration may vary all the way from 0 to 30% (in rare instances even higher) based on dried film.

At one time it was a common practice for painters to buy pure white lead in paste form and mix their own paint. This painter mixed product might contain as much as 10 to 12 pounds of lead per gallon of paint.

Such painter mixed finishes were used not only on exteriors, but on interiors as well. This practice has been discontinued for many years because of high cost and because more suitable interior finishes were developed for the trade.

Although it has been reported that some manufacturers used moderate amounts of white lead in a few interior finishes possibly as late as the year 1941, even this use, as far as we know, was discontinued because of high cost.

It is reasonable to state that for all practical purposes, with the development of lithopone and titanium pigments in the 1920's the manufacturers of most ready mixed paints discontinued the use of white lead in interior finishes. Many painters continued to use Paste White Lead for interior finishes until shortages developed at the beginning of the last world war. It is easy to see how an occasional coat of this high lead content paint could produce an analysis of a composite film of over 5% lead.

On the other hand, lead chromate in one form or another is now used in the paint trade as a color pigment in both interior as well as exterior finishes. For many of its uses there is not a satisfactory lead free replacement. However, from a chemical point of view, the lead in lead chromate is much less available than the lead in "White Lead". The amounts of lead chromate used in paint production have two limiting factors. One is cost. Since these colors are expensive, no manufacturer will use more than he feels is necessary. The other limiting factor is the quantity that can be put into a gallon of finished product. For example, it would not be practically possible to grind more than approximately 3 pounds of chrome yellow, containing approximately 2 pounds of lead into a gallon of enamel. To do so would seriously interfere with gloss and gloss retention. However, while it might be <u>possible</u> to use 3 pounds of chrome yellow, the practice is to use lesser amounts and make up the difference in hiding power with less expensive pigments that would contain no lead. It would be reasonable to state that the maximum amount of lead that might be introduced into a yellow enamel would be between 1½ and 2 pounds per gallon. Contrast this with the 10 to 12 pounds introduced into an old time painter white lead finish! And also bear in mind that this 1½ pounds of lead is in a relatively unavailable form compared with that in the white lead of the old time finish.

A yellow enamel such as is discussed above might be used on gasoline pumps, highway signs, earth moving equipment, etc. but would <u>not</u> be used for decorating the interior of homes. The experience of the paint industry has been that where more than 4% of lead (based on dried film) is introduced as tinting color, the public does not buy such finishes for interior work on homes, since the colors are not acceptable. Even at the 4% level sales will be very low. In the rare cases where more lead as lead chromate has been used, the finishes were

been used in the interiors of low income or slum homes. If they had been used, they could have been readily identified by their color.

It is known as a practical fact that the public does not buy interior finishes where the tinting color has introduced more than 4% lead as lead chromate. We can also state that most probably, where such a color has been used, for the sake of variety, a different color using less, or no lead will be used on the next repaint job. Thus the average lead content of several coats of interior paint on such a home would move steadily downward from 4%.

If we return now to the three reports mentioned earlier in this paper, we find the following in Dr. Chisolm's Baltimore statement, on page 2 "In most cases of intoxication source samples have been found to contain 'greater than 5% lead' by the method used".

In "Pediatrics" Volume 18, No. 6, referring to Baltimore studies we find the following statement "For each of the 105 exposed children, from one to five different sources containing greater than 1% of lead were identified among the various items each child was thought to have chewed. For 102 of them there was at least one source containing greater than 5% of lead. The lead was contained in the paint on the surfaces. The paint was old and flaking and frequently contained many layers, one or more of which may have been 30 to 70% of the total solids in the paint".

In the "Summary & Excerpts from the 1959 Passaic County Grand Jury Presentment", at the bottom of Page 1 we have the following:

"The paint from the window sill in Case No. 1 contained lead in an amount of 6.15%".

"The paint in the exterior flakings in Case No. 3 contained lead in an amount of 5.26%".

"The paint in the interior walls of the house in Case No. 4 contained lead in the amount of 9.4%".

Although there is no mention in any of the above cases of the form in which the lead existed, it is almost a mathematical certainty that all except very minor amounts would have been "White Lead". If by any chance, even minor amounts of lead chromate had been present, it could have been easily identified and estimated by the color.

This raises the question, have we ever identified any cases of lead intoxication in small children due to lead chromate? If all such cases are due to white lead, we should bear in mind that the manufacture of interior finishes containing this pigment was discontinued many

years ago. No problem now existd as far as manufacturing is concerned. Our real problem would lie in educating people not to use exterior paint on interior surfaces. There is also the need to prevent children from chewing painted surfaces out of doors.

Close records of future cases should be kept, if possible, in order to determine whether or not lead chromate is involved.

Lead free replacements for chrome yellow are sensitive to heat and light, are weak in hiding power, lack permanence in pale tints, and are unreliable with respect to color uniformity at the point of application of the paint.

In the meanwhile, if we are not able to discover any cases involving lead chromate, it would seem unreasonable to force upon the public the heavy expense required to replace the chrome colors now used for interior work. This would involve not only heavy expense, but would also result in a less satisfactory product for the public.

Presented to A.S.A. Sub-committee Z66-1 at New York City, February 24, 1960, by Lyman P. Hunter.

60 East 42nd St.
New York 17, N.Y.
February 10, 1960

To the Members and Alternates
of the A.S.A. Z66.1 Subcommittee:

Dr. M. R. Mayers

Dr. Charles Abler	Mr. H. G. Lamb
Dr. H. M. Cann	Dr. T. W. Nale
Mr. R. J. Eckart	Mr. D. S. Ring
Dr. J. H. Foulger	Dr. Maxwell Stillerman
Mr. Stuart Hoover	Mr. H. J. Whitson

A meeting of the Subcommittee will be held at 2:00 p.m. on Wednesday, February 24th, in Room 2946 of the American Standards Association, 70 East 45th Street, New York City.

Business to come before this meeting will include:

Consideration of a statement relative to the Z66.1-1955 American Standard by Mr. Lyman P. Hunter of Salt Lake City, who will attend the meeting by invitation. (See report of November 11, 1959 meeting.)

Consideration of a report by Mr. Ring and Mr. Hoover relative to paint coatings on metal toys.

Consideration of a report by Mr. Ring on the current status of precautionary labeling regulations applicable to paints on municipal, state and federal levels.

Discussion of possible amendments of the Standard (a) as proposed at the November 11, 1959 meeting, and (b) in the light of the above.

NOTES:

1. We have been notified by Dr. Foulger that the investigation undertaken at his suggestion cannot be completed for some months.

2. Invitations to attend the meeting have also been extended (a) to Dr. L. C. McGee, Medical Director of the Hercules Powder Company (now associated with the Imperial Paper and Color Corporation), (b) to Mr. R. L. Ziegfeld, Secretary-Treasurer of the Lead Industries Association, and (c) through Mr. Hunter, to such other representative of the Federation of Paint and Varnish Production Clubs as he may select.

THE IMPORTANCE OF FULL ATTENDANCE IS STRESSED.

Manfred Bowditch
Secretary

cc: Mr. L. P. Hunter
Dr. L. C. McGee
Dr. Edward Press
Dr. G. M. Wheatley
Mr. R. L. Ziegfeld