

FROM W. D. Kinsell, Jr. DATE September 24, 1971 FOR
CITY Cleveland, Ohio 44115
ANSWERING LETTER OF
SUBJECT INTERIOR LEAD PAINT ALERT

The following is extremely important to consumers of our products, our dealers and to the Company. Please read and take appropriate action as rapidly as possible.

Although the federal government has not to date issued regulations or enacted legislation on maximum lead content in paint, it is the intent of the Lead Based Paint Poisoning Prevention Act (Public Law 91-695) to prohibit the use of lead above the 1% level in all interior architectural paints. We can anticipate the national implementation of this act in the near future. There are, however, strict lead laws prohibiting the sale and/or use of more than 1% lead in interior paints now in effect in a number of cities and states including:

California	Baltimore, Md.	New Orleans, La.
Connecticut	Cincinnati, Ohio	New York City
Illinois	Cleveland, Ohio	Newark, N. J.
Kansas	Jersey City, N. J.	Philadelphia, Pa.
New Jersey	Minneapolis, Minn.	St. Louis, Mo.
New York	New Haven, Conn.	Washington, D. C.
		Wilmington, Del.

Very recently city officials in New York sampled retail outlets for compliance with the city's labeling laws and the state lead law. They found a number of paint products being offered for sale which did not really comply - unfortunately including two Glidden products. Both of these products were old materials which had been produced in the mid-1960's prior to the elimination of lead from our consumer items and had been in dealers' stocks for this time period. Glidden, nevertheless, was cited and suffered unfavorable publicity in New York newspapers including the Times, which has national circulation.

In light of current and impending laws and our experience in New York City, the entire Trade Sales line has been reviewed with the objective of taking necessary action to eliminate any possible problems as the result of present and future laws and regulations on lead in paint.

The Glidden consumer line now complies with all present and proposed laws, having been reformulated to eliminate or reduce lead content to well below the 1% maximum several years ago.

As part of our continuing effort not only to comply with the letter, as well as the spirit, of the law, but to enhance the safety of our products, a number of our painter-maintenance formulas are being changed and the distribution of others is to be limited to those painting contractors whose use of the product will be confined to industrial applications.

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In the Y-5600 and Y-5700 Ultra-Hide Alkyd Eggshell and Flat deep color lines we have four colors which now contain more than 1% lead --

Y-5694 and Y-5794 Tiber Green
Y-5695 and Y-5795 Scarlet Red
Y-5696 and Y-5796 Sun Yellow
Y-5697 and Y-5797 Citrus Orange

These four colors are to be either reformulated or discontinued and replaced with entirely new products in both the Alkyd Flat and Eggshell qualities to reduce lead content to substantially below 1%. In the meantime, these four colors in both the Ultra-Hide Flat and Eggshell lines cannot be sold for interior surfaces in the cities and states mentioned above. Distribution unit managers and inventory control managers responsible for physical distribution of our goods in each of these areas are to see to it that all stocks of these four colors in both lines are to be removed from distribution units' and dealers' shelves and returned to the supplying factory. The program of return of these materials is to be supervised and coordinated by the appropriate regional director who is to furnish this office with a copy of the written plan for return by no later than November 1, 1971.

In all other areas, deep colors of the Y-5600 and Y-5700 lines are not to be offered as consumer products through dealers or our own retail outlets until such time as new formulas are introduced reducing the lead content.

We have several colors in each of three other painter-maintenance lines which contain lead greater than 1%. These are the following colors in the Speedenamel, Q.D. Speedenamel, Silk Screen Acrylic, Hi-Gloss Silk Screen and Postad bulletin color lines:

Speedenamel

Y-4553 Deep Green
Y-4554 Medium Green
Y-4560 Medium Yellow
Y-4565 Bright Red
Y-4576 Deep Orange
Y-4510 Safety Orange
Y-4520 Safety Red
Y-4540 Safety Yellow

Q.D. Speedenamel

Y-4315 Light Red
Y-4316 Deep Red
Y-4324 Medium Orange - Discontinued 12/31/71
Y-4342 Pale Yellow " "
Y-4345 Bright Yellow " "
Y-4347 Medium Yellow " "
Y-4364 Dark Green " "
Y-4368 Deep Green " "

Silk Screen Acrylic

Y-7115 True Yellow
Y-7118 Vermilion
Y-7133 Yellow Green Spray Acrylic
Y-7144 Red
Y-7146 Yellow Green
Y-7148 Vermilion Spray Acrylic
Y-7149 Red Spray Acrylic

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Hi-Gloss Silk Screen

Y-7102 Fire Red F.D.
Y-7103 Bright Red F.D.
Y-7104 Lemon Yellow F.D.
Y-7105 Chrome Yellow F.D.
Y-7106 Medium Green F.D.
Y-7207 Dark Green Artprint
Y-7208 Emerald Green Artprint
Y-7212 Vermillion Red Artprint
Y-7213 Red Artprint
Y-7215 Primrose Yellow Artprint
Y-7217 Chrome Yellow Artprint

Postad Bulletin Colors
(Wooster Manufacturing)

Y-7001 Black
Y-7002 Vermillion
Y-7003 Fire Red
Y-7004 Bright Red
Y-7008 Medium Orange
Y-7009 Primrose Yellow
Y-7010 Lemon Yellow
Y-7011 Chrome Yellow
Y-7013 Emerald Green
Y-7014 Medium Green
Y-7015 Dark Green

Inasmuch as these products are not generally sold for residential use and are labeled in accordance with federal and state labeling regulations for products containing lead, we have less potential problem in their sale and distribution. However, these products should not be permitted to be sold through consumer channels wherein home owners could buy these items for use either on the interior or exterior of residences. If your dealers are carrying any of these three lines for sale to painting contractors or maintenance accounts, make certain that they are not stocked and displayed on retail shelves, but are kept in backup inventory locations for commercial-industrial contractor sales only.

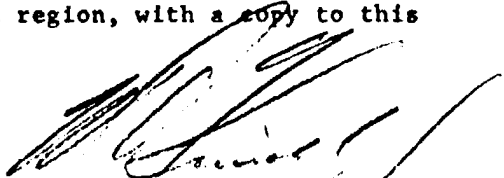
In the states and cities mentioned above, these products are not to be sold for interior residential use regardless of the channel of distribution and such information should be conveyed to dealers stocking these goods for resale to contractors, as well as to contractor customers.

The third area of potential problems lies in old inventories of Glidden products dating back prior to reformulation to eliminate or minimize lead content. As in the case of New York City, we may have some dealers - or former dealers - who are still carrying old stocks of discontinued colors of Glidden materials containing lead in excess of what local laws will allow. In such cases, Glidden is held responsible.

It is, therefore, requested that in the cities and states listed above, all distribution unit managers assume the responsibility for canvassing current and known former dealers to locate any of the products indicated on the attached sheet and see to it that they are removed from the dealers' shelves and returned to us. All contacts with customers and former dealers regarding location and

removal of these products are to be made on call reports, even though none of the products may be located.

Your cooperation will be the single most important contribution to Glidden's policy of conforming to both the spirit and letter of federal, state and local regulations on product safety and health. Again, a written plan must be prepared for follow through to meet this objective in each region, with a copy to this office.



W. D. KINSELL, JR.

Distribution:

Z-14, Z-16, Z-26, Z-27, Z-28,
Z-30, Z-38, Z-39, Z-42, Z-50, Z-52

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INACTIVE PRODUCTS CONTAINING MORE THAN 1% LEAD

Where a suffix letter is shown (Y-1212-E), the product was reformulated to less than 1% lead content and subsequent formula identifications (1212-F) were manufactured at satisfactory levels. In all other products where no suffix letter is shown the product containing more than 1% lead was discontinued on the date shown.

<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-1707	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 Yell.		85-Y-63

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<u>Y-Number</u>	<u>Product</u>	<u>Dates Active</u>	<u>Relabel No. or 85 Line No.</u>
Y-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
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	" " - Med. 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	" " - Med. Green		85-G-46

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<u>Y-Number</u>	<u>Product</u>	<u>Dates Active</u>	<u>Relabel or 85 Line No.</u>
Y-7207	Silk Screen - Dark Green		85-G-95
Y-7208	" " - Emerald Gr.		85-G-96
Y-7212	" " - Vermilion		85-R-110
Y-7213	" " - Red		85-R-111
Y-7214	" " - Orange		85-Y-80
Y-7215	" " - Primrose Yell.		85-Y-81
Y-7216	" " - Lemon Yellow		85-Y-67
Y-7217	" " - Chrome Yellow		85-Y-82
Y-7219	" " - Bright Orange		85-Y-68
Y-7235	Silk Screen - Emerald Gr.		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 Yell.		85-Y-41
Y-7255	" " - Lemon Yellow		85-Y-42
Y-7256	" " - Med. Chr. Yel.		85-Y-43
Y-7257	" " - Emerald Green		85-G-47
Y-7258	" " - Bottle Green		85-G-48

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