

September 12, 1972

Mr. L. A. Stratton
Vice-President
Sanders Brothers Co., Inc.
P. O. Box 5127
Richmond, Virginia 23220

Dear Mr. Stratton:

Subject: Federal Lead Content Law

We have reviewed the correspondence of your company concerning the Federal Lead Content Law. Your letters of August 1, 1972, and August 14, 1972, are inquiring on:

1. What Trade Sales and Kem products presently produced do not conform to the new law?
2. When was the formulation changed to conform to the new law for each Trade Sales and Kem product which we supply to you?

The Food & Drug Administration (F. D. A.) has confirmed the .5% level for lead in paint. This law becomes effective December 31, 1972. (See Attachment 1.)

In answer to your first point, all Trade Sales products (interior and exterior) and Kem products produced after July 1, 1972, comply with the .5% provision. Our Super Kem-Tone and Kem-Glo products have always conformed to less than the limits of the law.

Your second point cannot be answered quite as precisely. Each and every product that did not conform to the .5% level was reformulated on an individual basis starting early in the year 1971. It is not the date of formulation change, but the date of manufacture of that formulation change that tells when the paint conforms. Since the manufacturing plants produce independently of each other and the number of products run into the thousands, gathering exact dates for each product becomes a monumental, if not impossible, task.

On each label there is a label analysis to tell you the content of the formula. On each lid there is a stamped batch code to tell you when the product was manufactured.

In March of 1972 our company began putting a letter suffix after the manufacturing date to indicate the lead and other toxic heavy metal contents: (See Attachment 2.)

(cont.)

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Mr. L. A. Stratton

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1 - less than .06% lead and .05% other toxic heavy metals.

2 - less than .5% lead and .05% other toxic heavy metals.

3 - more than .5% lead and .05% other toxic heavy metals.

This classification will enable you to identify our lead and toxic heavy metal contents. All of our Trade Sales and Kem products will conform to this rating.

I trust this information will be of value to you in determining the contents of our products.

We appreciate this opportunity to be of service and wish to thank you for your interest and sales of our products.

Sincerely yours,

LOWE BROTHERS COMPANY, DIV OF
SHERWIN-WILLIAMS COMPANY

J. E. Arenschield, Jr.
Sales Service Coordinator

JRA/rh

Att.

cc: C. F. Higgins, Jr.

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