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ROUTE TO: Department

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LEAD PAINT REGULATIONS

LEAD REGULATIONS MAY BECOME IMPOSSIBLE!

Do you know that certain Congressmen, such as Rep. Ryan of New York, Sen. Kennedy of Massachusetts, representatives of the U.S. Public Health Service and the American Society of Pediatrics are promoting the passage of legislation that would limit lead in paints to 0.06% of the non-volatile content?--A virtual ban of lead in paints! Do you know that the Chicago City Council is holding hearings on an ordinance that would limit the lead content of paints to 0.03%, to be effective by January 1, 1973?

You probably say, "This is ridiculous," and we agree with you. No doubt you believe as we do that a lead content of less than 1% in residential paints does not present a hazard to anyone, and that any amount of lead in paints which are used for areas not accessible to small children does not present a hazard. Yet, these low limits will become law if the paint industry cannot convince the law makers that these very low lead limits are not necessary.

CAN THE PAINT INDUSTRY MANUFACTURE "LEAD-FREE COATINGS?"

Can the Paint Industry manufacture coatings without lead? Those who say "yes" are apparently thinking of formulas which do not call for lead pigments, lead driers or other lead additives. In other words, we can manufacture some paint products in which we do not intentionally add lead compounds. But let's analyze some of these "lead-less" products and see how much lead shows up in the analysis--more than you expect! A chemist from a large paint manufacturing company told me recently that they analyzed (by atomic absorption) several of their paints whose formulas showed no lead pigments, driers or additives. Lead was found in all the paints analyzed in amounts from 0.40% and greater based on the non-volatile content! How did the lead get there? As impurities in the raw materials, by contamination, from the water supply, errors in manufacturing? Perhaps from all these sources.

WHAT HAPPENS TO YOUR MANUFACTURING PROCESS?

Suppose you had to certify that all your paints contained 0.06% or less of lead:

- 1.) Would you have to analyze all batches of raw materials?
- 2.) Would all batches of paint need to be analyzed for lead content before they are filled into shipping containers?
- 3.) If lead were allowed in some coatings and not in others, could you manufacture both types in the same plant?
- 4.) How many batches of paint could you complete per day with this type of operation?
- 5.) Does your laboratory have the sophisticated, expensive equipment to do rapid lead analyses?
- 6.) Will your analytical instruments consistently reproduce accurate lead analyses at the 0.06% level? (Many experts say "no.") Will any analytical instruments do this on complicated coating products as a control test?
- 7.) If you could control the lead in your coatings to these extremely low levels, could the consumer afford to pay the added cost?

TECHNICAL EVIDENCE IS NEEDED

The Paint Industry needs proof that lead compounds as we use them in modern paints are not hazardous below a certain level. We know that some lead compounds (pigments, etc.) used in paint are much less soluble than others and thus are less bio-available and toxic to humans. But we don't know what these critical levels are and expensive research is needed to establish them. We at NPCA are trying hard to get the Federal Government to fund such research. We have not yet been successful in this effort.

WHAT CAN YOU DO?

- 1.) Be sure that the president and general management of your company understands the seriousness of this problem.
- 2.) Support research that will establish the critical lead level above which paint products may truly be considered hazardous.
- 3.) Use any influence you or your company possesses to explain our industry's case to your congressmen, state government representatives, or city council.
- 4.) Support the efforts of your National and Local Paint and Coatings Association and communicate to NPCA your comments on the questions asked in this bulletin.

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