F. Baugush

FCG

INTER OFFICE LETTER

JUL 3 1973

Cleveland — Coatings Operations

12 Midland — June 29, 1973

R. A. Schannen — Lead Audit of Household Paints

REPLY TO LETTER OF

Confirming earlier conversations and agreements made, we will continue the lead audit as a Continuing Quantitative Science, rather than as an undistributed Technical expense of the Analytical Research Department. We will schedule analysis of a set of 30 to 50 samples every four months. At approximately $10 per sample, this will cost us about $500 per series. We currently have a series of oil based interior semi-gloss and flats being gathered in Fort Andrews Laboratory for audit of May and June production. We had earmarked sufficient funds in our 1973 budget for analytical work to cover this. To cover the three audits scheduled next year for October, 1973, February, 1974, and June, 1974, we have included $1500 in the 1974 Color & Standards budget.

Previously, I coordinated this audit, assisted and advised by J. J. Lanzotti in selection of types of products to be audited. In the future, J. A. Pawley has been asked to coordinate this program between the paint audit groups and the analytical laboratory. Suggestions anyone might have for this program should be forwarded to him.

Our original idea was that this audit should be conducted according to a set statistical design for random sampling. However, our statistician confirmed that this would not really be possible if, because of analytical costs, we were only willing to audit 30 to 40 samples every couple of months. Nevertheless, he agreed that an accumulation of audits with good results would eventually have statistical significance in support of documenting our good performance. Any bad results would be cause for serious concern, warranting a response of either 100% testing to prove the bad results to be chance occurrences, or massive efforts to improve our practices to assure prevention of contamination by lead.

We proceeded on this basis, being generally pleased with our performance for the first three sets so early in the program. Or we were at least satisfied with the reasons given to J. Lanzotti for those few failures that were discovered, or were convinced that appropriate corrective action had been taken to avoid such failures in the future. Rather than try to be completely random about the audit, it is suggested that J. A. Pawley continue to request groups of samples or product classes which would seem in themselves to answer the questions most consistent with the program objectives--product line most likely to be consumed, product line most likely to be ingested by children, product line produced at the most plants and likely to be representative of general practice in production at each of the plants, but products which are currently regulated. Again, specific recommendations anyone might have in this regard should be forwarded to J. A. Pawley.

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You had asked me earlier about results of lead analysis on samples picked up recently by J.D. in our Chicago and Detroit plants. For your information, our own analysis of duplicate samples confirmed all samples to be essentially lead free. The maximum found was 0.006% lead in solids of one Chicago sample of KJ Y68 and 0.003% lead in solids of one Detroit sample of KJ Y 91. The other seven samples contained 0.001 to 0.003% lead of solids. FDA reportedly found them all to contain less than 0.01% lead.

It is assumed that J. L. Hauley and R. L. Scott will both maintain a complete file of all of the results in a form suitable for use as evidence to support our lead control program and policy, should that be required. To this end, I am transferring my file, or copies thereof, to J. L. Hauley.

As set up, I saw the following advantages to our current manner of use of the existing audit labs for collection of samples. I assume you and others agree.

1. It was not necessary to add another lab to which our plants must send samples, nor were they required to take extra samples just for the lead audit.

2. It is an objective audit from the standpoint that only the coordinator knows what class of products are going to be audited during a certain period.

The only apparent disadvantage is the need to transfer and relabel portions of the selected samples. This has to be done carefully by the Paint Auditing Laboratory to avoid contamination and insure a representative split of the sample for both audits.

James D. McKinness
Manager of Reliability

JDM:db

cc: HBJ, PHC, [illegible], CTB, [illegible], [illegible], [illegible], [illegible], [illegible], [illegible], [illegible], LD-cL, JK

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