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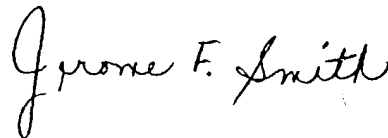
February 9, 1973

SUBJECT: ANSI STANDARD Z-66.1 - 1973
RE: PAINTS ACCESSIBLE TO CHILDREN

Gentlemen:

We have been asked to submit a ballot on the proposed "ANSI Standard for Paints and Coatings Accessible to Children." May we, therefore, have your comments on or before February 23rd. In our view, the proposed standard, copy of which is attached, is satisfactory, however, we would like your evaluation.

Sincerely,



JFS:lm
Attachment

Jerome F. Smith
Secretary & General Manager

LIA-76818

AMERICAN NATIONAL STANDARD
Z66.1-1964 (R1973) FOR
SPECIFICATIONS FOR PAINTS AND COATINGS ACCESSIBLE TO CHILDREN
TO MINIMIZE DRY FILM TOXICITY

1. Scope and Purpose. This standard specifies the requirements for coatings such as paints, enamels, lacquers, etc., applied in liquid form, that are deemed suitable from a health standpoint to be used to paint children's toys or furniture, interior surfaces and wood-cased pencils so that the danger of poisoning will be minimized if, by chance, some of the dry coating should be ingested by a child.
2. Specifications. A liquid coating material to be deemed suitable, from a health standpoint, for use on articles such as furniture, toys, wood-cased pencils, etc., or for interior use in dwelling units where the dry film might be ingested by children:
 - 1) Shall not contain lead compounds of which the lead content (calculated as Pb) is in excess of 0.5% of the total weight of the contained solids (including pigments, film solids and driers).
 - 2) Shall not contain compounds of antimony, arsenic, cadmium, mercury or selenium of which the metal content individually or in total (calculated as Sb, As, Cd, Hg and Se, respectively) is in excess of 0.06% by weight of the contained solids (including pigments, film solids and driers); and
 - 3) Shall not contain barium compounds of which the water soluble barium (calculated as Ba) is in excess of 1% of the total barium in such coatings.
3. Marking. Coatings complying with this standard may be marked:
"Conforms to ANSI Z66.1-1973 for use on surfaces to which children are commonly exposed".

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AMERICAN NATIONAL STANDARD
Z66.2/1973 FOR CHILD-RESISTANT (OR SAFETY) CLOSURES
FOR CONTAINERS OF HOUSEHOLD CHEMICAL PRODUCTS

1. Scope and Purpose. This standard specifies the requirements for closures for containers of solid and liquid-type household chemical products including unit packages, that are deemed suitable from a health standpoint to be used as child-resistant or safe closures so that the danger of poisoning will be minimized if, by chance, some of the household chemical product including medications should be ingested by a child.
2. Specifications. A closure to be deemed suitable, from a health standpoint, for use as a child-resistant (or safe) container of solid and liquid household chemical products including medications where the chemicals might be ingested by a child:
 - 1) Shall be significantly more difficult to open initially and repeatedly (for the number of openings customarily required for its size and contents) by children under five years of age than the ordinary screw cap or snap-off closure.
 - 2) Shall be able to be opened and to be properly reseated without undue difficulty by most normal adults.
 - 3) Shall be provided with instructions for opening and closing in clear and legible form.
 - 4) Shall be of such material and such design that it would preserve the efficacy and quality of the chemical and medication under use conditions.
 - 5) Shall be designated as a child-resistant closure providing the tests have been done under the protocol conditions described below, and providing further that the closure shall successfully resist the attempts of at least 85% of the children to open the closures without demonstrations and at least a total of 80% with demonstrations. (In the case of unit packaging successful resistance shall be failure to open or gain access to five or more units or to units which constitute the amount that may produce serious personal injury or serious illness for a 25 pound child.) In addition, at least 90% of the adults 18-45 years of age shall be able to successfully open and re-close the closure.

Testing Procedure or Standard Protocol for Determining Adherence to Standards for Significant Resistance to Accidental Opening by Children

A. A panel of a minimum of 200 children between the ages of 42 to 51 months inclusive, evenly distributed by age, shall be used to test the ability of the closure to resist opening by children. The even distribution by age shall be determined by having 20 children (plus or minus 10%) whose nearest age in months would be 42 months, 20 whose nearest age would be 43 months, 20 at 44 months, etc., up to and including the 20 at 51 months of age. The sex of the children in each age group shall be divided between male and female with no more than a 10% preponderance of either sex, and records retained as to which were and were not successful in opening the various closures. The children selected shall be healthy, normal, and shall have no obvious or overt physical or mental handicaps.

B. The children shall be tested in groups of two and the testing shall be carried out in a location that is not strange or unusual but one which is familiar to the children (e.g., their customary nursery school or regular kindergarten). Not more than two different closures shall be tested by a particular pair of children. Each pair of children to be tested shall receive the same type of closure at the same time, if more than one closure is being tested in a series; however, a different order shall be used for various pairs of children, and this order shall be randomized and recorded. The closure shall be given to each of the two children with a request for them to open it. (In the case of unit packaging, it shall be presented exposed so that the individual units are immediately available to the child.) The child shall be allowed a period of up to five minutes to open it. For those children unable to open the closure after the first five minutes, a single visual demonstration, without verbal explanation, shall be given by the adult and a second five-minute period be allowed to open the closure. (In the case of unit packaging, a single visual demonstration, without verbal explanation, will be provided at the end of the first five minutes only for those test subjects who have not opened at least one unit package, and a second five minutes allowed for all subjects.) If he fails to use his teeth after the first five minutes, the demonstrator shall indicate or state he is permitted to use his teeth if he wishes. Records

shall be kept on the number of those unable to open the closure with and without demonstration. (In the case of unit packaging, records shall be kept on the number of individual units opened or gained access to by each child.)

C. One hundred adults with no overt physical or mental handicaps between 18 and 45 years of age inclusive, 70% of whom are female, shall be used as the test panel for normal adults. The adults shall be tested individually rather than in groups of two or more. Written instructions to the adults shall be to open the closure and they shall be allowed up to five minutes to open the closure. Records shall be kept on the number of those unable to open and those unable to properly replace the closure.

D. The manufacturers of the closure or package must certify that these are manufactured to such technical specifications that over 99% of the mass-produced closures or packages will conform to the specimens provided for testing. The exact percentage shall be as close to 100% as can be obtained by good current manufacturing practice. All of the closures shall have been checked by the tester to make sure that the closure can be opened, and that it was properly seated or closed before it was given to the individual child or adult to be tested.

3. Marking. Closures complying with this standard may be marked "Conforms to ANSI Z66.2-1973 for use as a child-resistant (or safety) closure for household chemical product containers".