

February 2, 2010

The Truth about lead issues affecting our industry.

There has been a lot of confusion and anxiety present in our industry relative to the issue of lead and its impact on the window and door industry. Following are facts regarding the current regulations pertaining to lead content in materials and what those regulations actually are meant to address. Included within this document are links to the applicable governmental regulations to help inform and educate the market on these facts, as well as updated information relative to the products Truth Hardware supplies to the market and how we perform against these regulations.

FACT: Consumer Products Safety Commission (CPSC)

- Maximum allowable level of lead content in most consumer products to be at 600 parts per million (ppm).
- **Lead Content Limits [Section 101. Children's Products Containing Lead; Lead Paint Rule - Consumer Product Safety Improvement Act \(CPSIA\)](#)**
 - The limits on the amount of lead in children's products are phased in over the course of three years.
 - February 10, 2009, products designed or intended primarily for children 12 and younger may not contain more than 600 ppm of lead.
 - After 1 year from enactment, or August 14, 2009, products designed or intended primarily for children 12 and younger cannot contain more than 300 ppm of lead.
 - The limit goes down to 100 ppm after three years, or August 14, 2011, unless the Commission determines that it is not technologically feasible to have this lower limit.

FACT: Are windows and doors considered Children's Products? No – not according to this Q & A posted on the CPSC website. [FAQs For Section 101: Children's Products Containing Lead; lead paint rule - Consumer Product Safety Improvement Act \(CPSIA\)](#)

- **What furniture articles are exempt under CPSC regulations? Do the lead paint limits apply to furniture whether or not the furniture is intended for children?**
- 16 C.F.R. § 1303.1 provides that the lead paint limits apply to toys and other articles intended for use by children, as well as furniture articles for consumer use that bear lead-containing paint. Furniture articles include, but are not limited to beds, bookcases, chairs, chests, tables, dressers, desks, pianos, console televisions, and sofas. However, they **do not** include appliances such as ranges, refrigerators, dishwashers, clothes washers and dryers, air conditioners, humidifiers and dehumidifiers; fixtures such as bathroom fixtures, built-in cabinets, chandeliers, **windows, and doors**; or household items such as window shades, venetian blinds, or wall hangings and draperies.

FACT: Truth Hardware uses zinc identified as ZAMAK 3 in the die-casting of our products certified at containing lead equal to a maximum level measured at just 40 ppm (see below).

- The suppliers of zinc to Truth Hardware must abide by American Society of Testing and Materials (ASTM) for allowable levels of lead content.
- **ASTM B240-09** is the standard specification for Zinc and Zinc-Aluminum Alloys in Ingot Form for Foundry and Die Castings.
 - Maximum level of lead equal to 40 ppm (0.004%) which is 13% of the allowable ppm standard.
- Truth Hardware also requires an internal audit of material content of zinc to insure all suppliers abide by the regulated standards. The results of these audits net lower than the 40 ppm on a regular basis.

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FACT: New EPA requirements under the Renovation, Repair and Painting Program (RRP) will soon be in place to address potential hazards with lead based paint used in pre-1978 homes as is detailed below:

- To protect against this risk, on April 22, 2008, EPA issued a [rule requiring the use of lead-safe practices](#) and other actions aimed at preventing lead poisoning. Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination

Additionally, in [Section 101. Children's Products Containing Lead; Lead Paint Rule - Consumer Product Safety Improvement Act \(CPSIA\)](#) the amount of lead allowed in surface coatings or paint for products designed or intended primarily for children 12 and younger was reduced to 90 ppm (from the current limit of 600 ppm) effective August 14, 2009.

FACT: Truth Hardware's paint suppliers are required to continually certify their paint for lead content that conforms to applicable governing regulations. These requirements are consistent with CPSIA's new regulation (at 90 ppm) for products designed or intended primarily for children 12 and younger.

Rest assured that given the focus of this type of issue, Truth Hardware will continue to test and certify our suppliers and products on a regular basis to insure that we are conforming to all applicable governing regulations.

With this information now in hand, you can see that Truth Hardware's zinc products substantially outperform the requirements of the ASTM standards. These standards (while not required) meet the level designed for children 12 and younger in accordance with the Consumer Products Safety Improvement Act (CPSIA).

Truth Hardware takes these issues very seriously – and so should you. When confronted by claims that may create concern over your hardware decisions, or even those that could impact your own product sales and the channels in which they are installed and used, we urge you to take the time to understand all the facts and don't be confused or led astray by companies who try to capitalize on consumer fear or doubt. Be informed and understand all the facts. Ask questions if information is not available to you, and leverage data from independent sources or standards.

Truth Hardware has been your source of quality products for the fenestration industry for over 50 years – we supply dependable, reliable and safe products which meet and exceed the requirements established by our governing bodies. You can depend on Truth to remain well-informed of these regulations and also in our ability to continue to provide you with products that you can trust – from a company that you can trust.

Thank you for your support of Truth Hardware – your faith and confidence in our products as well as our company is something we will never take for granted.

Sincerely,

Steve Groves
Sr. VP of Sales, Marketing & Product Development
Truth Hardware