



MANUFACTURING CHEMISTS ASSOCIATION

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November 2, 1977

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LAW DEPT.

To: Members of the Intercommittee Group on Chemical Safety
Publications
Mr. Jack S. Snyder, Merck and Company, Inc.
Dr. Warren H. Jones, Eastman Kodak Company
Dr. I. A. Rosenthal, Rohm and Haas Company
Mr. John A. Stichnoth, Union Carbide Corporation

Gentlemen:

At this time I would like to institute procedures for the preparation of drafts of the Safety Data Sheets that are listed as "First Priority" in Appendix A enclosed with this letter. (These SD's correspond to those listed in categories II and V, with some minor changes, from my March 25, 1977 letter addressed to the members of the S&FPC, OHC, LAPIC, and LAC.) As we work our way through the SD's in the first priority list, workable procedures for the preparation of future drafts will evolve. These latter drafts are listed as second priority and third priority in Appendix A.

Most of the SD's not listed in Appendix A were identified in my March 25 letter as up to date except for minor matters. Although some will be addressed by minor amendment at reprinting, others may be subject to temporary withdrawal. Meanwhile their distribution will continue until we finish new drafts for the SD's listed in Appendix A.

Other SD's not listed in Appendix A are either now ready for revision-or-reaffirmation within the planned three year cycle or soon will be ready. These are: SD-16, Phosphorous, SD-43, Acetaldehyde, SD-44, Chromic Acid, SD-57, Methyl Amines, SD-95, Phosgene, SD-101, Sulfur Trioxide, and SD-102, Chlorosilanes.

To assure us of authoritative and unbiased review, we have instituted a continuous current awareness search of the published literature to be carried out by the Franklin Institute Research Laboratories (FIRL) for all the chemicals included in our SD's. When pertinent information is received from FIRL, it will be conveyed to the appropriate working group assigned to the SD in question. Additionally the information will be useful in deciding whether a published SD need be withdrawn promptly from distribution.

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L. C. HOIT, JR.

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I propose the following procedure for trial on the first priority SD's and invite your suggestions before we actually initiate action. Please refer to Appendix B, which is the Table of Contents for the current draft of the Guide for the Preparation of Chemical Safety Data Sheets.

1. For each SD, the Safety and Fire Protection Committee assumes overall responsibility and designates a person or group of persons to prepare the initial draft of most SD sections.
2. Other MCA standing committees have an interest in particular sections and should designate those individuals to review or prepare such sections, as may be appropriate:

Section 4 - the Occupational Health Committee
Labeling - the Labels and Precautionary Information Committee

Section 8.3 - the Chemical Packaging Committee
Sections 8.4 and 8.5 - the Transportation Equipment Committee
Section 9 - the Water Resources, Air Quality, and Solid Waste Management Committees

In carrying out the above, the following steps are suggested:

- A. Working with the Intercommittee Group on Chemical Safety Publications and with MCA Technical Staff members, I will establish deadline dates for the completion of the first drafts of the SD's.
- B. I will advise the chairmen and vice-chairmen of each of the eight committees of these dates, requesting the assignment of individuals to "Working Groups" for each SD. Each chairman subsequently will advise me of the names of the individuals assigned.
- C. I will send copies of the Guide for the Preparation of Chemical Safety Data Sheets to the members of the "Working Groups", along with copies of the most recent pertinent SD.

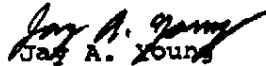
AP00027300

For each Safety Data Sheet:

- D. As necessary, I will coordinate the work and its scheduling among the members of the Working Group.
- E. Once a draft is prepared, I will edit it for consistency and compliance with the Guide for the Preparation of Chemical Safety Data Sheets.
- F. This edited version will be separated into parts corresponding to the committee responsibilities described in paragraphs 1 and 2, above, and the appropriate parts sent to each of the members of those committees, for comment. (A sample of the form to be used is enclosed.)
- G. This edited version also will be sent for comment to outside reviewers not associated with the chemical industry directly but expert in the fields of toxicology, occupational health, industrial hygiene, and materials handling. To this end we have made a contractual arrangement with FIRL.
- H. Editorial comments received will be incorporated as practical into a "Final Draft". Substantive comments will be reviewed by the Working Group and may be incorporated into the "Final Draft".
- I. I will send the Final Draft to members of the S&FPC, OHC, and LAPIC for a letter ballot vote, with only limited opportunity for further comments. (A sample of the form to be used is enclosed.)
- J. After the letter ballot vote and incorporation of any final comments, the Final Draft will be reviewed by Counsel. Following Counsel's approval, it will be printed for public distribution.

Thank you for your attention to this long letter; I await your comments.

Sincerely,


Jay A. Young

Manager

Technical Publications

4 Enclosures:

Appendix A, SD Priority List

Appendix B, Contents, SD Preparation Guide

Request for Comments, Sample

Letter Ballot, Sample

JAY/sal

cc: Chairmen and Vice-Chairmen of S&FPC;
OHC; LAPIC; LAC; AQC; CPC; SWMC; TEC; & WRC.
B. M. Barackman, MCA and MCA Technical Staff
members.

AP00027301

Appendix A

Page 1

First priority

Either temporarily withdrawn from distribution or out of print and needing substantial changes.

SD#	Title
2	Benzene
3	Carbon tetrachloride
4	Phenol
8	Ammonia, anhydrous
12	Carbon disulfide
13	Ammonia, aqua
14	Trichloroethylene
15	Acetic anhydride
18	Ethylene dichloride
19	Dimethylsulfate
24	Perchloroethylene
31	Acrylonitrile
37	Styrene monomer
40	Methyl chloride
42	Sodium chlorate
46	Sodium and potassium dichromates and chromates
56	Vinyl chloride
58	Naphthalene
63	Toluene
74	Sulfur
81	Benzyl peroxide
85	Acrolein
89	Chloroform
90	1,1,1-Trichloroethane

AP00027302

Appendix A

Page 2

Second priority

Need substantial changes, but now in print.

SD#	Title
9	Caustic Soda
26	Phosphorous oxychloride
45	Ammonium dichromate
48	Cresol
52	Sulfur dioxide
70	Phosphoric acid
72	Isopropyl amine
73	Toluene diisocyanate
76	Diethylenetriamine
83	Methyl ethyl ketone
87	Acetone
88	Maleic Anhydride
93	Dinitrotoluenes

AP00027303

Third priority
Need moderate changes.

SD#	Title
17	Aniline
23	Calcium carbide
28	Phosphoric anhydride
29	Ethyl ether
38	Ethylene oxide
49	Bromine
50	Ethyl chloride
53	Hydrogen peroxide
54	ortho-Dichlorobenzene
61	Phthalic anhydride
65	Mixed acid
66	Antimony trichloride
67	Hydrocyanic acid
69	Benzyl chloride
71	Phosphorous pentasulfide
77	Sulfur chlorides
78	Butyraldehydes
79	Methyl and ethyl acrylate
82	Toluidine
86	Methylene chloride
97	Diethylamine
99	Allyl chloride
100	Ethylene

AP00027304

TABLE OF CONTENTS

Guide for the Preparation of Chemical Safety Data Sheets

Front Matter	(Introduction or Preface)
Section 1	NAMES
	1.1 Chemical Name
	1.2 Common Names
	1.3 Formula
Section 2	PHYSICAL AND CHEMICAL PROPERTIES
	2.1 Grades and Strengths
	2.2 Physical Properties and Critical Values
Section 3	TRAINING AND JOB SAFETY
	3.1 Employee Education and Training
	3.2 Safety Review
Section 4	HEALTH FACTORS
	4.1 Toxicity
	4.2 Industrial Hygiene
	4.3 Medical Management
	4.4 First Aid
	4.5 Personal Protective Equipment
Section 5	FIRE HAZARDS AND FIRE FIGHTING
	5.1 General
	5.2 Special Hazards
Section 6	INSTABILITY, REACTIVITY HAZARDS AND CONTROL
	6.1 Instability Hazards
	6.2 Reactivity Hazards
Section 7	ENGINEERING CONTROL OF HAZARDS
	7.1 Building Design
	7.2 Equipment Design
	7.3 Ventilation
	7.4 Electrical Equipment
	7.5 Static Electricity

AP00027305

TABLE OF CONTENTS

Guide for the Preparation of Chemical Safety Data Sheets (continued)

Section 8	STORAGE, LABELING AND PLACARDING, SHIPPING, HANDLING
8.1	Storage
8.2	Precautionary Labeling, Identification, and DOT Labeling and Placarding
8.3	Non-Bulk Containers
8.4	Bulk Transport
8.4.1	General
8.4.2	Tank Trucks
8.4.3	Tank Cars
8.5	Shipping
Section 9	WASTE DISPOSAL GUIDELINES AND SPILL CONTROL
9.1	Waste Disposal Regulations
9.2	Spill and Leak Control
9.3	Disposal of Wastes
Section 10	TANK, EQUIPMENT CLEANING AND REPAIRS
10.1	Preparation for the Job
10.2	Preparation of the Tank or Equipment
10.3	Tank Entry
10.4	Emergency Rescue
10.5	Cleaning and Repairs to Tanks or Equipment

AP00027306