

Manufacturing Chemists' Association, Inc.

MINUTES OF MEETING

LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

OCTOBER 5-6, 1965

New York Offices, American Cyanamid Co., Time & Life Building

PLAINTIFF'S
EXHIBIT
CMA-181MEMBERS PRESENT

C. B. Shaffer, Chairman
E. J. Masek, Vice Chairman
L. W. Burnette
C. U. Dernehl
R. H. Dewey
C. L. French
J. T. Gormally
J. W. Hammond
E. J. Hogan
H. H. McIntyre
J. A. Mooney
R. F. Philpitt
A. W. Sheldon
G. R. Sido
F. D. Sparre
F. G. Stephenson
R. G. Troup
N. E. Wendt
N. G. White
J. R. Stevens, MCA Board Liaison
M. M. Hoover, Secretary

American Cyanamid
Diamond Alkali
General Aniline
Union Carbide
Commercial Solvents
Mallinckrodt
Pennsalt
Humble Oil
Allied Chemical
Dow
FMC
Olin Mathieson
M & T Chemicals
Monsanto
Du Pont
MCA
J. T. Baker
American Potash
Shell Chemical
J. T. Baker
MCA

GUESTS PRESENT

C. P. Brush
A. C. Diliberto
E. M. Dixon
M. B. Lore
Henry Moras
J. F. Osteritter
J. B. Packer
John Tuttle

Koppers
Stauffer
Celanese
Du Pont
Stauffer
--
FMC (American Viscose)
Enjay

Before opening up the main business of the meeting, which was the revision of the LAPI Manual, the chairman welcomed the guests. Then he expressed the committee's gratitude to F. G. Stephenson for his work as MCA Staff Representative and Secretary to the committee over the past several years. A formal recognition will be made via a letter from the chairman to the association according to the unanimous vote of the committee.

MANUAL REVISION--DEFINITIONS

The chairman solicited comments and suggestions concerning his proposed set of definitions to replace those in the last edition of the manual.

After these were received, he pointed out that the issues had been brought into sharp focus. He then urged the Manual Revision Subcommittee to follow through on the resolution of these issues so that a vote on the definitions could be reached no later than the next meeting of the full committee.

There was considerable concern expressed over the need for precise definitions. Those who favored precision cited the need for systemization and consistency in labeling. The chairman said that it was the lack of these things that caused the enactment of legislation in this general area such as the Federal Hazardous Substances Labeling Act.

Other concerns expressed included the need for compatibility of the proposed definitions with I.C.C. regulations for industrial chemicals, the desirability of not following blindly the wording of the FHSIA, and the desirability of a separate section in the next edition for tests which support the definitions.

Comments and suggestions specific to the individual proposed definitions included the following paraphrases:

Hazardous Chemical--Use "Hazardous Substance" rather than "Hazardous Chemical."

Toxic Substance--Use "LD 50" rather than "median lethal dose" because of greater familiarity with the former.

How is it possible to get as much as 2,000 milligrams absorbed through the skin?

Corrosive--Four hours rather than one hour should be the time specified for destruction of tissue because it might take that long in some cases before corrective treatment could be administered.

Irritant--This definition has the same wording as that in the Federal Hazardous Substances Labeling Act.

Strong Sensitizer--The LAPI Committee voted to adopt this definition several meetings ago.

-3-

Combustible Liquid--The temperature range in this definition is the same as that appearing in the definitions section of earlier editions of the manual.

Flammable Substance--With regard to the third portion of this definition, should we concern ourselves with self-pressurized containers since chemicals so packaged are household rather than industrial chemicals?

The definition is incomplete in that it does not specify the container.

There should be a category for materials which form peroxides on standing.

Extremely-Flammable Substance--With regard to self-pressurized containers, is any degree of valve opening the proper wording in connection with flashbacks?

Dangerously Reactive Substance--With respect to pyroforics, the last three words "incident to transportation" should be struck, since we are concerned with self-ignition under conditions beyond just those incident to transportation.

MANUAL REVISION--WARNING LABEL STUDY SHEET

The committee voted to adopt as a unit a block of amendments to the data form used for gathering labeling information. Thirteen votes were cast in favor of this action. The amendments are as follows:

Structural Formula and Composition--References to resins to be deleted.

Uses--"Proposed" to be changed to "intended."

Containers--This section to be deleted.

Physical Properties--Odor and specific gravity to be added.

Literature References--This section be added.

I.C.C. Classification--This section to be added.

Antidote Statements--This section to be added, and to be worded "First Aid and/or Antidote."

Fire Extinguishing Characteristics--This section to be added, and to be worded "Recommended Fire Extinguishing Agents."

No action was taken with respect to the balance of the form having to do with physical and health hazards. The chairman felt that this portion depends on the decisions regarding definitions, so that its consideration will have to be deferred. A contrary opinion was expressed to the effect that the set of definitions to appear in the manual need not be related to the study sheet wording.

MANUAL REVISION--ACTION ON SUBCOMMITTEE RECOMMENDATIONS

The following recommendations of the Manual Revision Subcommittee were approved by voice vote:

1. That Part III be deleted from the manual with appropriate notation in Part I.
2. That the committee continue its present policy of requiring adequate back-up data before considering a proposed label text.
3. That the following labels be included in Part II: all labels from the last edition, labels for all chemicals having Chem-Cards or water transportation cards, labels for all chemicals having Safety Data Sheets, and labels for selected chemicals discussed in the minutes since the last manual was put out.
4. That first aid directions be included in all labels texts which include the poison symbol (skull and cross-bones).
5. That the next edition have the same format, page size, type faces, etc., as the last edition.

The following recommendations of the subcommittee were tabled until the next meeting of the full committee:

1. That texts be revised where appropriate to include information on the production of extremely hazardous combustion products under fire conditions.
2. That information about firefighting be included on labels.

MANUAL REVISION--AD HOC SUBCOMMITTEE FOR DATA ASSEMBLY

The chairman appointed the following ad hoc subcommittee for the purpose of assembling label data for the next edition of the manual: J. W. Hammond, Chairman; L. W. Burnette; C. L. French; A. W. Sheldon; and N. G. White.

LIAISON ACTIVITY

Industry Committee on Weights & Measures--F. D. Sparre reported that the matter of English and metric units will come up for consideration at the next executive session. By a voice vote, the LAPI Committee requested that its position be presented to indicate it has no objection to any undertaking in the area of weights and measures provided appropriate exemption is made for industrial packaging.

CSMA--E. J. Hogan reported on the May 16, 1965 meeting of the CSMA General Labeling and Regulatory Advisory Committee.

ACGIH--J. W. Hammond reported the availability of "Threshold Limit Values For 1965" adopted at the May 2-4, 1965 meeting of ACGIH. Containing 38 additions, the new edition may be helpful in the preparation of labels. Dr. Osterritter warned that the information should be used with caution.

NFPA--H. H. McIntyre reported on the status of the various NFPA publications which are of direct interest to the LAPI Committee. (See his memo of September 21, 1965 which was sent to each committee member.)

NPVLA--F. D. Sparre reported that nothing of direct concern to the LAPI Committee transpired at the last meeting of the NPVLA.

-5-

SAFETY DATA SHEET LABELS

Dinitrotoluene--F. D. Sparre reported that some progress has been made despite conflicting information. As soon as this is straightened out, there will be a label to recommend.

Perchloric Acid--E. J. Hogan presented the typeset proofs of the Perchloric Acid Safety Data Sheet for review. The committee decided on the addition of two precautionary statements to the label: (1) "Avoid breathing vapor or mist" and (2) "Use only with adequate ventilation." These are to be inserted in the order given below the statement "Do not get in eyes, on skin, on clothing." A motion to qualify the label head by adding "72% or less" in parentheses after "Perchloric Acid" was defeated by a 6 to 4 vote.

OTHER LABELING MATTERS

Container Decontamination and Disposal--Concern was expressed over the possible spread to industrial chemicals of the regulations now covering the labeling of pesticides that leave hazardous residues in the container. E. J. Hogan will make a proposal in this connection at the next meeting.

Labeling of Bulk Chemicals as Pesticides--It was reported that the USDA has asked an MCA member company to label its chlorine transported in bulk containers as a pesticide under a FIFRA regulation. The interpretation apparently hinges about the end use. If the product is sold for use as a pesticide, then the whole tank has to be so labeled.

COMMITTEE FUNCTION

The proposed general statement of the LAPI Committee's function as approved at the May 11-12, 1965 meeting came up for discussion. Doubts were expressed as to the need for such a statement.

A comment was made to the effect that this statement came into being as a result of the committee's dissatisfaction with the wording of its function as presented on page 18 of the September, 1964 edition of the MCA Directory of Officers, Board of Directors, Committees, Members.

The decision was made to examine the wording appearing in the newest edition of the directory, and then to discuss the matter again at the next meeting.

NEXT MEETING

The next meeting of the full committee will be held Tuesday and Wednesday, February 1-2, 1966 in Washington.

Respectfully submitted,

Morgan M. Hoover

Morgan M. Hoover
MCA Staff Representative
LAPI Committee

MMH:sjg