

MANUFACTURING CHEMISTS' ASSOCIATION
608 Woodward Building
Washington 5, D.C.

December 18, 1946

TO MEMBERS OF THE TECHNICAL COMMITTEES

Subject: Proposed Revision of ICC Definition of Class B Poisons

Dear Sirs:

The following letter from Chief Inspector H.A. Campbell of the Bureau of Explosives dated December 11 raises a very important subject which should receive full consideration by the technical committees of the M.C.A. I am consequently suggesting to Mr. Campbell that action on the matter which he proposes be delayed pending the spring meetings of the technical committees. You are hereby requested to carefully consider Mr. Campbell's proposal and be prepared to take final action upon it at the next series of meetings which will probably be held during the month of April 1947.

Text of Mr. Campbell's letter follows:

"From time to time the definitions defining less dangerous poisonous articles, Class B liquids, and less dangerous poisonous articles, Class B solids, have been criticized. They are included in the ICC Regulations as Sections 336 and 350.

"We are now in receipt of a suggestion from the E.I. duPont de Nemours & Company that these paragraphs be rewritten to read as follows:

'Poisonous liquids and solids (including pastes and semi-solids) are substances which are susceptible of being taken by mouth and when so taken by the average adult person in amounts of thirty grains (two grams) or less, rapidly (within fifteen minutes or less) jeopardizes life by other than mechanical or physical action; or substances which if spilled or vented from their containers during transportation, the vapors therefrom concentrate in the atmosphere in such proportions that when inhaled by the average adult person, rapidly (within fifteen minutes or less) jeopardizes life by other than mechanical or physical action.'

"May we have your recommendations before submitting the proposed rewording to the Interstate Commerce Commission."

Very truly yours,

M.F. Crass, Jr.,
Assistant Secretary

PLAINTIFF'S
EXHIBIT
CMA-272