

Manufacturing Chemists' Association

OF THE UNITED STATES

(FOUNDED 1872)

WARREN N. WATSON
SECRETARY

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L-131

MINUTES OF MEETING
LABELS AND PRECAUTIONARY INFORMATION COMMITTEE
Parlors E and H, Hotel New Yorker, New York, N.Y.
Thursday and Friday, March 28-29, 1946

PLAINTIFF'S
EXHIBIT
CMA-270

The meeting of the Labels and Precautionary Information Committee was called to order by Chairman W. N. Watson on Thursday, March 28, 1946 at 10:00 A.M. The following were present:

W. N. Watson, Chairman	L. L. Hedgepeth (Friday only)
T. R. Aalto	S. J. Hill
Carl Anderson	D. D. Irish
A. G. Cranch	R. W. Lahey (Friday only)
J. T. Fuess	Frank S. Low
Richard F. Hansen	Robert D. Minter
	J. A. Noone (Alt. for Mr. Hedgepeth)

Guests: J. B. Williamson, American Cyanamid Company
Dr. J. H. Foulger, E. I. duPont de Nemours & Co.
F. D. Sparre, E. I. duPont de Nemours & Co.
W. W. Sunderland, The Dow Chemical Company
Dr. Wm. A. Knapp, General Chemical Company
C. D. Marlatt, The Martin Dennis Company (Friday PM only, on Chromium Compounds)

I. LABELS

1. Insecticide Label. The report of a subcommittee on Insecticide labels - R. F. Hansen, chairman - sent to members of the LAPI Committee on January 15, 1946, was reviewed and revised to read as follows:

"The LAPI Subcommittee on Insecticide Labels met in Philadelphia on January 8, 1946, and selected the following insecticides as being sufficiently important and representative to warrant the preparation of illustrative caution labels:

Barium Fluosilicate	Paris Green
Bordeaux Mixture	Sodium Fluosilicate
Calcium Arsenate	Zinc Arsenate
Lead Arsenate	Zinc Arsenite
Magnesium Arsenate	

"It is the opinion of the Subcommittee, and therefore recommended, that each of these products be labeled as follows in addition to (1) the name of the product; (2) the word "POISON" with skull and crossbones; and (3) an appropriate antidote:

Avoid breathing dust or spray mist.
 Wash thoroughly before eating or smoking.
 Clear up spillage.
 Store away from feed or food products.
 Do not apply to edible portions of plants unless
 residues will be removed before eating.

(on household packages substitute for the storage caution: "Store away from foods, drugs, and out of the reach of children.")

and that labels for uncolored industrial fluorides, not sold for insecticidal use, bear the following additional statement:

Uncolored. Not for insecticidal use.

"It is also recommended that if a caution label for sodium fluoride is included in Manual L-2, it be followed by a note reading substantially as follows:

NOTE: All inorganic fluorine compounds sold for insecticidal use which are acutely toxic to man should be colored.

"It is the opinion of the Committee that a caution label for Nicotine Sulfate Solution should be developed in cooperation with Tobacco By-Products Company, and that action by this Committee be deferred pending an opportunity to discuss the problem with that Company."

2. Dry Ice Label. Consideration was given to the following label submitted by Mr. J. H. Remick, Jr., chairman of the subcommittee, and subsequently cleared through the CGMA;

Do not touch with bare skin -- use gloves.
 Do not confine in stoppered or other tightly closed containers.
 Do not enter poorly ventilated spaces where used or stored.

The chairman was requested to resubmit to the subcommittee the following wording as the recommendation of the LAPI Committee:

DRY ICE
 (Solid Carbon Dioxide)

WARNING! EXTREMELY COLD (109°F below zero)
 CAUSES SEVERE BURNS
 LIBERATES HEAVY GAS WHICH MAY CAUSE SUFFOCATION

Do not get on skin or hands.
 Do not taste.
 Do not put in stoppered or closed containers.
 Do not enter places where used or stored until adequately ventilated.

3. AHF, First Aid Treatment. Following a presentation by Mr. L. L. Hedgepeth on the AHF label, with particular reference to the addition of the use of ice and alcohol in the first aid treatment -- subsequently approved by the USPHS -- it was agreed that in view of the absence of peacetime importance of this product the AHF label should be omitted from the revised L-2.

4. Hydrogen Peroxide Label. Mr. Hedgepeth reported that consideration had been given to the recommendation of the IAPI Committee at their February meeting with reference to changes in hazard and caution statements in the Hydrogen Peroxide labels (See IAPI Minutes L-122), and that it was the consensus of the manufacturers of strong hydrogen peroxide that no changes were necessary in the present labels since they are used only on peroxide not exceeding 130 volume strength. It was accordingly agreed to retain the original wording except for the addition of the words "and not exceeding 130 volume" to the "stronger than 25 volume" hydrogen peroxide label.

5. Polyacid Fluorides. It was agreed to delete the label for polyacid fluorides from Manual L-2 as inconsistent with the committee's attitude on group product labels. In accordance with this decision the label for "fluorine salts" in L-2 was changed to sodium fluoride.

6. Chlorine Label. Mr. Low submitted the following copy for a chlorine label now in the final stages of approval by the Chlorine Institute:

CHLORINE
(Under Pressure)

DANGER! HAZARDOUS LIQUID AND GAS

Avoid breathing air containing this gas.
Avoid contact with skin or eyes.
Do not heat cylinders.
Have available emergency gas masks approved by
U.S. Bureau of Mines for Chlorine Service.
Handle and use only in accordance with practice
recommended by the chlorine producer.
In case of exposure, remove patient to fresh air,
keep warm and quiet, and send for a physician.

7. DDT Caution Label. The question of including the cautions for DDT formulations in Manual L-2 was reviewed, resulting in a decision to exclude this item from that publication.

8. Oxalic Acid Label. Following a letter presentation by Mr. Gillett of the Victor Chemical Company, a subcommittee consisting of Dr. Aalto and Mr. Hill recommended the following revision which was approved:

WARNING! HARMFUL IF TAKEN INTERNALLY
CAUSES SKIN IRRITATION

Avoid breathing dust.
Avoid contact with skin.
In case of contact, immediately flush with plenty of water.
Do not take internally.
Keep away from feed or food products.

9. Chromates. Mr. C. D. Marlatt of the Martin Dennis Company, chairman of the subcommittee on chromium compounds, appeared before the committee in regard to revision of these labels, and following an extended review the following revisions were approved for incorporation in the revised L-2:

CHROMIC ACID

WARNING! CONTACT WITH COMBUSTIBLE MATERIAL MAY CAUSE FIRE
CAUSES SEVERE BURNS

KEEP CONTAINER CLOSED.
Avoid contact with skin or eyes.
Avoid breathing dust or solution spray.
Do not take internally.
In case of contact, immediately flush skin or eyes with
plenty of water for at least 15 minutes; for eyes, get
medical attention. Remove and wash clothing before re-use.
Use fresh clothing daily. Take hot shower after work using
plenty of soap.

AMMONIUM BICHROMATE

WARNING! FLAMMABLE
HARMFUL DUST
MAY CAUSE RASH OR EXTERNAL ULCERS

KEEP AWAY FROM HEAT, SPARKS, AND FLAME.
KEEP CONTAINER CLOSED.
Avoid contact with skin or eyes.
Avoid breathing dust or solution spray.
Do not take internally.
In case of contact, immediately flush skin or eyes with
plenty of water for at least 15 minutes; for eyes, get
medical attention. Remove and wash clothing before
re-use.
Use fresh clothing daily. Take hot shower after work
using plenty of soap.

SODIUM BICHROMATE
(Sodium Chromate, Potassium Bichromate, and Potassium Chromate)

WARNING! HARMFUL DUST
MAY CAUSE RASH OR EXTERNAL ULCERS

KEEP CONTAINER CLOSED.
Avoid breathing dust or solution spray.
Avoid contact with skin or eyes.
Do not take internally.
In case of contact, immediately flush skin or eyes
with plenty of water for at least 15 minutes; for eyes,
get medical attention. Remove and wash clothing
before re-use.
Use fresh clothing daily. Take hot shower after work
using plenty of soap.

10. Cresylic Acid. Dr. Foulger discussed injuries which resulted from
exposure to spray vapor and also warm vapor and it
was agreed to restore "Do not breathe vapor" in the label in the revised L-2,
eliminating the phrase "Harmful Vapor."

11. Calcium Cyanide. In conformity with cautions for insecticides as
reported in Minute I-1, it was agreed that the storage
instructions on Calcium Cyanide should be changed to: "Store away from feed
or food products".

In the case of all other non-insecticides in L-2 the caution "Keep away from feed or food products" will be retained.

12. Tank Car Labels. On behalf of Mr. Hedgepeth, Mr. Noone reported that experimental labels now being tried out would be sent to each member of the IAPI Committee.

13. Manual L-2 Rescission Actions. Following a review of the scope of the respective proposals, it was voted to rescind the following actions taken at the February IAPI Committee meeting:

Inclusion in the index of the revised Manual L-2 of a list of products for which labels are not required.

Inclusion of copies of the USPHS label agreements.

Inclusion of the report on antidotes.

14. USPHS Comment on Manual L-2. The chairman read the following letter from the Industrial Hygiene Division of the USPHS, approving Manual L-2:

(Letter from J. G. Townsend dated March 12 transmitting the following opinion of Dr. Paul A. Neal and Dr. von Oettingen in regard to the AHF revised label, and also their comment on the revised draft (1946) of L-2.)

"In accordance with your request, we have reviewed the letter from Mr. Watson to you of March 5, 1946, asking 'if you feel this new addition is a sound contribution; particularly with reference to the anhydrous label.'

"It is our opinion that the phrase, 'Soak affected areas with crushed ice in 70% ethyl alcohol until physician arrives,' should be incorporated into the label for both anhydrous and aqueous hydrofluoric acid.

"Dr. von Oettingen and I also reviewed Mr. Watson's manual, entitled 'MANUAL L-2 Revised Draft 2-20-46.' We both feel that the authors should be congratulated. We have two minor suggestions for Mr. Watson's consideration, i.e., (1) on page 27 in the label for nitric acid it seems to us advisable to insert the following additional precaution: 'Avoid contact with organic material such as sawdust, straw and excelsior,' and (2) we believe that trichloroethane should be labeled like tetrachloroethane rather than like tetrachloroethylene and trichloroethylene."

In accordance with the suggestions in the above letter, it was agreed with respect to (1) Nitric Acid, that this subject be referred to the Nitric Acid subcommittee of the Carboy Committee for consideration and recommendation; and with respect to (2) to delete trichloroethane from Manual L-2 because of its negligible commercial importance.

15. Manual L-1. Schedule 6. Mr. Carl Anderson questioned from the viewpoint of policy the inclusion in Manual L-1 of Schedule 6, relating to the labeling of commercial shipments of chemical products whose properties may not be fully known, in its present form. Following an extensive discussion it was unanimously agreed to remove Schedule 6 from Manual L-1,

and to refer the matter to a subcommittee consisting of Mr. Anderson and Mr. Hansen for revision, looking toward its publication as a supplement to L-1.

Definitions. Mr. Noone submitted a subcommittee report on the definitions of gases and vapors, and it was agreed that this report should be submitted to the entire committee for study and subsequent action.

II. NEW YORK A.2061

Mr. Fuess reported that although this bill -- presenting an amendment of the Penal Law to require labeling of certain products, as submitted to the LAPI Committee on March 4, 1946 -- had been killed within the committee, an effort to revive it through the Rules Committee was made, and was again defeated. It was agreed that if the bill is reintroduced in the next session a representative of the association should take steps to ascertain the purpose of the bill and to offer cooperation in developing a practical approach to the problem.

III. DEFINITION OF CORROSIVE LIQUIDS

The report of the subcommittee -- Messrs. T. P. Callahan and Carl Sundstrom -- was reviewed and discussed at length and the following revision referred to them for reconsideration, the stricken words being deleted from the subcommittee recommendation:

"Corrosive liquids are those ~~which contain free acids or free caustic~~ ~~alkalies in such concentrations~~ that when in contact with living tissue, will cause severe damage of such tissue by chemical action; or in case of leakage, will materially damage or destroy other freight by chemical action; or liable to cause fire, when in contact with organic matter or with certain chemicals."

The chairman was authorized to submit the recommendation to Mr. Campbell of the Bureau of Explosives following approval of the revision by the subcommittee.

IV. CRESYLIC ACID - CLASSIFICATION AS CLASS B POISON

Following discussion, it was agreed to remove this subject from the docket.

V. MISCELLANEOUS

1. Color Code Strike-offs. The chairman submitted color strike-offs for acid labels showing black ink combinations with blue, green, orange and red. This was in response to a prior request of the committee based on a report made by the Color Code Committee - R. W. Lahey, chairman.

Sample labels for nitric, hydrochloric, ammonium hydroxide and sulfuric acid were submitted by several members, and examined.

The report of the Color Code Committee, dated March 8, 1945, was reviewed, and the LAPI Committee agreed to refer the question of color codes for selected products to the subcommittee for reconsideration. The subcommittee, in addition to chairman Lahey, comprises W. H. Gushard, and S. J. Hill.

2. Labeling of Household Packages. The suggestion that household packages carry the phrase "keep out of the reach of children" was discussed. As other phrases might be necessary for a balanced cautionary statement, the following subcommittee was appointed for Household Packages of Chemical Products: F. S. Low, Chairman; Carl Anderson, and F. D. Sparre.

3. NYU Toxicological Research. Mr. Low reported that New York University is considering setting up toxicological research facilities. Discussion revealed a shortage of toxicologists and the urgent need of getting more trained men and facilities to handle new chemical products. It was pointed out that the M.C.A. had not associated itself with any institutional work and that individual investigations must be considered from the standpoint of the facilities of a particular laboratory.

4. N.Y. Bar Assn. Committee on Poison Law. Preliminary reports indicate that the Food, Drug, and Cosmetic Section of the New York Bar Association (C.W. Dunn, Chief) has passed a resolution recommending the passage of a Federal poison act. Mr. Anderson stated that he would endeavor to get a copy of the resolution and would keep the committee advised.

5. Index of Hazards from Volatile Liquids. The following progress report was presented by Dr. J.H. Foulger:

"The index of possible hazard from volatile liquids which I suggested at an early meeting of the LAPI Committee was based upon the following argument:

"A hazard to workers will arise whenever they must enter enclosures in which there may be leaking containers of volatile liquids or if they should carry or open such containers in such a way that their heads are near to the point of leakage. The maximum of hazard would occur when the atmosphere they breathe is saturated with the vapor of the liquid.

"The concentration of vapor in a saturated atmosphere can be calculated from the vapor pressure of that liquid since in a saturated atmosphere the relative values of vapor and air will be proportional to the partial pressures existing.

"The degree of hazard involved in breathing such a saturated vapor might be characterized by a figure denoting the relationship between the saturated concentration and that concentration of the vapor which is known to produce physiological effects within, say, 5 to 30 minutes. If the saturated vapor concentration is greater than the physiologically effective concentration, then a hazard exists; if less, the hazard is not great for such a period of exposure as 5 minutes to 30 minutes.

"In calculating the final index, I use the following:

1. Vapor Pressure at 25°C. = P
2. Concentration of Vapor in p.p.m. at 25°C. = $\frac{1,000,000 P}{760}$
3. Hazardous Concentration = V
4. Index of Hazard = $\frac{\text{Saturated Concentration}}{\text{Hazardous Concentration}} = \frac{1,000,000 P}{760 V}$

"Using this formula, the data for carbon tetrachloride and, for comparison, data on four other liquids are as follows:

<u>Name</u>	<u>Vapor Pressure</u> <u>25°C.</u>	<u>Conc. causing</u> <u>definite physio-</u> <u>logical effects</u> <u>in</u> <u>5 - 30 mins.</u>	<u>Index of</u> <u>Hazard</u>
Carbon tetrachloride	110	4,800 p.p.m.	30
Carbon bisulfide	340	800 "	560
Benzol	80	5,000 "	20
Cyclohexane	96	9,300 "	14
iso-Amyl acetate	6	1,000 "	8

"The indices have been calculated in these cases to the nearest tens. The data selected are taken from Lehmann and Flury, "Toxicology and Hygiene of Industrial Solvents."

"Since all indices are greater than one, some hazard would exist to workmen handling leaking containers of all of these liquids or entering places where leaking containers are stored; however, the actual degree of hazard differs widely and we might classify hazards in ranges such as the following:

<u>Index</u>	
0 - 1	No appreciable hazard
1 - 15	Slight hazard
16 - 40	Moderate hazard
Above 40	Severe hazard

(End of quote)

6. Flannagan Bill. Consideration was given to the chairman's memorandum of March 21 to the LAPI Committee concerning H.R.5645, Section 2-t of which provides that the term "misbranded" shall apply to any economic poison which, in the judgment of the Secretary of Agriculture, is not labeled adequately to prevent injury to "living man and other vertebrate animals, vegetation, and useful invertebrate animals."

It was agreed that it may be desirable to consult subsequently with Federal authorities on this question, and that the cautions adopted in the report of the insecticide subcommittee constitute the first step in precautions for insecticides.

7. National Safety Council. The chairman advised the committee of an invitation to speak on the LAPI Committee label program at the Chicago meeting of the National Safety Council, October 8 or 9. No action taken.

8. USPHS Methanol Agreement. The chairman was instructed to appoint a subcommittee to review the pending agreement with the USPHS on the methanol label. The following committee was appointed: S. J. Hill and Dr. A. G. Cranch.

9. N.Y. Fire Dept. Code. The Committee discussed a recent interpretation of the New York City Fire Department Administrative Code which requires a fee of \$25 per year per product to transport, store or sell inflammable or combustible mixtures within the City of New York. It was reported that the tax does not apply to a specific chemical if the label carries the name of the chemical. The label, however, must carry the permit number.

VI. CALIFORNIA LABELING REGULATIONS

Mr. Watson supplemented his report of February 28 to the committee on the developments in California concerning the proposed Injurious Substances Safety Orders.

VII. OPEN FORUM

The following topics were discussed in the open forum session held on Friday, March 29:

1. A review of the Washington State Court decision on Sodium Chlorate (sent to Committee March 11, 1946)
2. Attitude of management on the adoption of labels, it being reported that excellent support for the program has been given.
3. LAPI Committee members agreed to submit at the next meeting for examination by the committee selected samples of different types of labels recently adopted by their companies.
4. Samples of labels for sale by the Jarboe Printing Co., Rear, 626 F St.S.W., Washington, D. C., were distributed. (Letter of March 1 announced this service).
5. The question of special cautions for decomposition products from excessive heating of inorganic chemicals was reviewed and it was agreed that cautions should be confined to the ordinary uses. For example, a manufacturer of an axe could not be held liable or responsible for directions for use if the axe were used as a substitute for a razor.
6. Future Program. Following the submittal of the resignation of Mr. Hedgepeth as a member of the LAPI Committee, the chairman was requested to invite Mr. J. S. Coey of the Hooker Electrochemical Company to become a member of the committee.

The following committee was appointed to draft a model state label bill: R. F. Hansen, Chairman; Carl Anderson, W. N. Watson.

7. Gratification was expressed of the cooperative attitude of members of the committee, and the impartial approach which has been taken toward the labeling of products in the interest of effective caution labeling.

One member reported that his board of directors had expressed the opinion that he should retain his membership on the committee, and that older members should be continued, to maintain balance as new personnel is appointed, and to ensure perpetuation of policy and accumulated experience.

8. It was suggested that an article in popular vein should be written on the handling and storage of household chemicals and drugs (suggested title: "Death in the Medicine Closet"). Each member agreed to send to the chairman specific thoughts or suggested topics for incorporation in such an article for publication in one of the weekly magazines, one proposal being to confer with the scientific editor of the Saturday Evening Post after a specific outline for an article has been assembled.

9. Reference was made to the State Law Index - an index to the legislation of the States of the U.S. enacted during the biennium, 1943-44, tenth biennial volume. 789 p. Available from the Superintendent of Documents, Washington, D. C. \$2.50 per copy.

VIII. NEXT MEETING

It was agreed that the next meeting of the committee should be held at the Hotel New Yorker on October 9 and 10. In accordance with past practice, reservations for out-of-town members will be made by the M.C.A. office, subject to individual member confirmation.

IX. ADJOURNMENT

The meeting adjourned Friday, March 29, 1946, at 4:00 P.M.

W. N. WATSON
Chairman

Minutes subject to approval.