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L-726

Manufacturing Chemists Association

MINUTES OF MEETING

LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

June 20-21, 1972

Eastman Kodak Co. Conference Room - Rochester, N. Y.

Members Present

G. R. Sido, Chairman	Monsanto Company
R. C. Andrews	Diamond Shamrock Corporation
S. W. Beckstead	Kerr-McGee Chemical Corporation
H. A. Birnbaum	3 M Company
C. P. Brush	Koppers Company
R. H. Dewey	Commercial Solvents Corporation
E. M. Dixon	Celanese Corporation
K. H. Ferber (6/20) (for E. J. Hogan)	Allied Chemical Corporation
J. T. Gormally	Pennwalt Corporation
J. W. Hammond	Enjay Chemical Company
W. H. Jones	Eastman Kodak Company
D. G. MacKellar	FMC Corporation
H. H. McIntyre (6/20)	The Dow Chemical Company
C. J. O'Connor	Stauffer Chemical Company
R. F. Philpitt	Olin Corporation
R. E. Rutherford	Gulf Oil Corporation
C. J. Stroemple (for W. L. Hammond)	PPG Industries, Inc.
R. G. Troup	J. T. Baker Chemical Company
M. M. Hoover, Secretary	MCA Staff

Guests Present

J. A. Gerber	The Harshaw Chemical Company
J. S. Mackay	USS Chemicals
G. R. Marriott	The Harshaw Chemical Company
Orton Overman (6/21)	Stauffer Chemical Company
J. J. Robinson	Mobil Chemical Company
Jack Turer	Witco Chemical Corpporation
Peggy Walton (6/21)	MCA Staff
A. G. Wheeler	ICI America Inc.

Members Absent

D. E. Brown	Mallinckrodt Chemical Works
L. W. Burnette	GAF Corporation
C. U. Dernehl	Union Carbide Corporation
W. L. Hammond	PPG Industries, Inc.
E. J. Hogan	Allied Chemical Corporation
M. B. Lore	E. I. du Pont de Nemours & Company
Clarence Lowery	MC&B Manufacturing Chemists
C. B. Shaffer	American Cyanamid Company
A. W. Sheldon, Vice Chairman	M&T Chemicals, Inc.

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1. MEETINGS

a. Minutes of Last Meeting - The minutes of the January 25-26, 1972 meeting were approved as distributed.

b. Next Meeting - It was decided to hold the next meeting September 13-14, 1972 in New York.

2. PERSONNEL

The secretary read to the committee Norman White's letter of March 15 in which he notified MCA of his retirement effective April 1.

Mr. Philpitt was designated to receive $10 from each committee member for the purpose of purchasing a gift for Dr. White and for Mr. Masek, who has also left the committee as noted in the minutes of the last meeting.

3. LIAISON ACTIVITIES

a. American Congress of Governmental Industrial Hygienists - Mr. Hammond reported that he would prepare a list of changes to TLV's adopted at the ACGIH San Francisco meeting for distribution to the committee, and that the 1971 values will be adopted this month by the Occupational Safety and Health Administration. He also mentioned that the fourth edition of "Air Sampling Instruments for Evaluation of Atmospheric Contaminants" is now available from ACGIH in Cincinnati.

b. American National Standards Committee Z35 (Hazard Symbols) - The secretary reported that the proposed Z35.3 standard has been temporarily withdrawn by the sponsor.

c. American Petroleum Institute - Mr. Hammond reported that the API Precautionary Labeling Committee is considering a revision of its Bulletin 2511 to reflect new definitions for flammable and combustible substances.

d. Association of American Pesticide Control Officials - The chairman referred to Mr. Lore's request of June 16 to LAPIC for input from committee members, should they have any, in connection with the annual AAPCO meeting to be held the week of August 6 in Des Moines.

e. Chemical Industries Association Ltd. - The secretary called attention to the new duties of the CIAL Hazardous Chemicals Warning Committee as mentioned in the draft report sent to LAPIC March 27, and to the British government concern with the conflict between the EEC directives for storage and use vs. the IMCO, ADR, RID, etc. regulations for transport as recorded in the DS(E)(72)3 attachment to the February 22 mailing to LAPIC.

f. Council of Europe - The secretary called attention to the availability of the third edition of the "Yellow Book" as noted in his mailing of May 17 to LAPIC.

g. European Economic Community - The secretary called attention to the status of the various EEC directives as given in the minutes of the February 17 meeting of the CIAL Hazardous Chemicals Warning Committee (sent to LAPIC April 18), and to the March 23 mailing to LAPIC indicating the 69 substances (mostly organic peroxide and solvents) added to the Directive on Substances.

h. MCA Board of Directors - The chairman reported that the Board Liaison Committee still wishes suggestions from committees for environmental performance rating systems, and that he is scheduled to give a brief presentation on LAPIC activities at the January 9 full Board meeting.

The secretary noted that minutes of the February 8 meeting of the Liaison Committee were sent to LAPIC, and that a report on LAPIC activities prepared by the chairman was attached.

i. MCA Ad Hoc Committee on Chemicals Regulation - The secretary reported that the House hearings on toxic substances

control legislation are over, that the committee report is not yet out, and that there are hopes the final House action will be less restrictive than the Senate-passed bill.

j. MCA Inter-Committee Task Group on OSHA Regulations - The chairman reported on the May 9 meeting of the task group, noting that LAPIC had been requested to make recommendations concerning a revised OSHA Material Safety Data Sheet and OSHA labels for the guidance of the MCA representative on the advisory committee to be appointed by OSHA to deal with implementation of Sections 6(B)(7) and 8(C)(3) of the Occupational Safety and Health Act.

The committee recommended that the task group approve the MSDS form suggested by Dr. Shaffer (sent to LAPIC by him June 9) as modified to delete Section 2.8, add evaporation rate and risk ratio (evaporation rate over TLV) in Section 2, and make certain editorial adjustments.

The committee also recommended that MSDS's be confined to certain categories as indicated in Dr. Shaffer's letter of June 6 to Mr. Stephenson, but that where an OSHA label would suffice no MSDS should be prepared.

With regard to OSHA labels, the committee recommended they be per MCA Manual L-1. The matter of possible expansion of labels to meet the requirements of Section 6(B)(7) was referred to (ref.: Dr. Shaffer's letter of June 12, copies to LAPIC). The chairman indicated he will send a memo to the full committee to get a reaction to the concept of recommending labels which would be, in essence, condensed versions of safety data sheets.

In preparation for the May 9 meeting of the inter-committee task group, a meeting of LAPIC members was held May 8 in the Monsanto offices in New York. Attending were Messrs. Sido, Dernehl, Hogan, Lore, McIntyre, Philpitt, Shaffer, Sheldon, Troup, and Hoover. This group proposed Drs. Shaffer and Dernehl as MCA representatives on the above-mentioned OSHA advisory committee. The inter-committee task group at the May 9 meeting recommended Dr. Shaffer as the MCA representative, with Dr. Dernehl as the alternate.

As reported in the secretary's memo of March 9 to LAPIC, another LAPIC task group met March 8 at the Union Carbide offices in New York to develop an MCA response to the NIOSH proposal for an asbestos label to be adopted as part of an OSHA standard. Participating at this meeting were Messrs. Hogan, Dernehl, Shaffer,

Sheldon, and Hoover. Sent to LAPIC on June 12 was the June 7 Federal Register notice on the promulgated standard.

k. MCA Public Relations Department - Mrs. Walton asked committee members to advise her if they may be able to assist in manning the Consumer Information exhibits detailed in the minutes of the January 25-26, 1972 meeting.

She also referred to the November 20 public relations program to be held in New York in conjunction with the MCA Semi-Annual Meeting, and distributed copies of the June 16 memo to the MCA Public Relations and Education Activities Committees requesting suggestions for chemical industry participants and outlining the program. The chairman indicated he would get speaker suggestions to her by July 3. Dr. Jones was suggested for one of the toxicology spots.

l. MCA Occupational Health Committee - Dr. Birnbaum reported that OHC is working with the MCA Ad Hoc Committee on Chemicals Regulation, and that it is dealing with the current problems involving phosgene, vinyl chloride, and fluorocarbons.

m. National Agricultural Chemicals Association - The chairman reported that the NACA is considering establishing a recommended pattern for labels for highly-toxic insecticides, with a view towards seeking EPA adoption.

n. National Paint and Coatings Association - The secretary referred to Mr. Lore's report of March 23, in which he mentions that the revision of the NPCA publication "Recommended Precautionary Labels" for paints and related products subject to FHSA will take at least another three months, and that development of precautionary labeling for industrial paints and related products has been assigned to a subcommittee for prompt attention.

The secretary also referred to Mr. Lore's report of May 23, which mentions that a subcommittee of the NPCA labeling committee is working with the EPA Pesticides Regulation Division on a section of the forthcoming NPCA publication "Guidelines for Registering Pesticides". This section is to deal with how to claim mildew resistance as a property of a coating, without getting the product classified as a registrable pesticide. This report states further that the philosophy for this appears in FIFRA Interpretation 3, and that examples of permissible and impermissible claim language will be included in the guidelines.

o. U.S. Department of Transportation - The chairman reported that DOT can now be expected to work with both DOL and NFPA on

labeling matters, and there are indications that what will be required are labels which are in essence a condensed version of a safety data sheet.

The chairman also referred to the June 16 mailing to MCA transportation contacts (copies to LAPIC) concerning the DOT notice in the June 15 FEDERAL REGISTER containing a proposal for new definitions of flammable, combustible, and pyroforic liquids. Corporate comments to MCA have been requested by August 15.

4. LABEL PREPARATION

a. Labels (General) - The chairman indicated he would appoint a task group to investigate the general subject of labeling for container disposal.

The chairman also appointed a task group consisting of Drs. Jones (chairman), Dernehl, Dixon, and Shaffer to consider adding "if conscious" to the first aid statement for ingestion for general application.

With regard to the general update of labels in Chemical Safety Data Sheets, assignments were made for the new batch to be considered at the next meeting, where it was necessary to re-assign. Scheduled in this new batch are labels for SD-26 (Phosphorus Oxychloride), SD-28 (Phosphoric Anhydride), SD-29 (Ethyl Ether), SD-31 (Acrylonitrile), SD-34 (Tetrachloroethane), SD-43 (Acetaldehyde), SD-44 (Chromic Acid), SD-45 (Ammonium Dichromate), SD-46 (Sodium and Potassium Dichromates), SD-47 (Sodium, Metallic), SD-48 (Cresol), and SD-50 (Ethyl Chloride).

It was strongly urged that drafts of these labels be prepared immediately, together with justification of language used, so they can be sent to the committee for letter ballot through the secretary by July 20, to allow time for consideration by the committee and resolution of differences prior to the September 13-14 meeting.

b. Label for SD-1 (Formaldehyde) - Reconsideration of the label approved at the September 1971 meeting was tabled pending receipt of information from Dr. Dixon.

c. Label for SD-6 (Paraformaldehyde) - Action on this label was again tabled pending receipt of information from Dr. Dixon.

d. Label for SD-14 (Trichloroethylene) - An amended version of the draft label sent to the committee February 15 was approved.

e. Label for SD-15 (Acetic Anhydride) - An amended version fo the draft label sent to the committee February 15 was approved.

f. Label for SD-16 (Phosphorus) - An amended version of the draft label sent to the committee February 15 was approved.

g. Label for SD-17 (Aniline) - Action on the draft label sent to the committee February 15 was tabled pending medical advice concerning proper language to be used when referring to clothing. It was suggested that some reference to this should appear among the precautionary statements. Mr. Brown was requested to recommend a solution after receiving guidance from Messrs. Dernehl, Dixon, Hammond, and Shaffer.

h. Label for SD-19 (Dimethyl Sulfate) - Action on the draft label sent to the committee February 15 was tabled pending receipt of new toxicological information. Mr. Brown was requested to prepare a new draft after consulting with Messrs. Dernehl, Dixon, and Lore.

i. Label for SD-20 (Sulfuric Acid) - An amended version of the draft label sent to the committee February 15 was approved.

j. Label for SD-20 (Oleum) - An amended version of the draft label sent to the committee February 15 was approved.

k. Label for SD-21 (Nitrobenzene) - Action on the draft label sent to the committee February 15 was tabled pending medical advice concerning proper language to be used when refering to clothing. Mr. Brown was requested to recommend a solution after receiving guidance from Messrs. Dernehl, Dixon, Hammond, and Shaffer.

l. Label for SD-22 (Methanol) - The draft label sent to the committee February 15 was approved as is.

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m. Label for SD-23 (Calcium Chloride) - The draft label sent to the committee February 15 was approved with editorial changes.

n. Label for SD-26 (Phosphorus Oxychloride) - A task group consisting of Messrs. O'Connor (chairman), Lowery, and MacKellar was appointed to prepare a draft label for review by the committee prior to the next meeting.

o. Label for SD-28 (Phosphoric Anhydride) - A task group consisting of Messrs. O'Connor (chairman), Brown, and Sido was appointed to prepare a draft label for review by the committee prior to the next meeting.

p. Label for SD-29 (Ethyl Ether) - A task group consisting of Messrs. Troup (chairman), Dewey, and Hammond was appointed to prepare a draft label for review by the committee prior to the next meeting.

q. Label for SD-31 (Acrylonitrile) - A task group consisting of Messrs. Lore (chairman), Shaffer, and Sido was appointed to prepare a draft label for review by the committee prior to the next meeting.

r. Label for SD-34 (Tetrachloroethane) - A task group consisting of Messrs. Lore (chairman), Brush, and Jones was appointed to prepare a draft label for review by the committee prior to the next meeting.

s. Label for SD-42 (Sodium Chlorate) - Action on the draft label sent to the committee December 16 was referred back to Dr. Jones and Mr. McIntyre for reconsideration of the second hazard statement and the precautionary measure associated with it.

t. Label for SD-43 (Acetaldehyde) - The previously appointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

u. Label for SD-44 (Chromic Acid) - The previously appointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

v. Label for SD-45 (Amminium Dichromate) - The previously appointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

w. Label for SD-46 (Sodium and Potassium Dichromates) - The previously appointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

x. Label for SD-47 (Sodium, Metallic) - The previously appointed task group consisting of Messrs. Jones (chairman) and

McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

y. Label for SD-48 (Cresol) - The previously apppointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

z. Label for SD-50 (Ethyl Chloride) - The previously appointed task group consisting of Messrs. Jones (chairman) and McIntyre was requested to prepare a draft label for review by the committee prior to the next meeting.

aa. Label for SD-99 (Allyl Chloride) - An amended version of the draft label sent to the committee March 15 was approved.

bb. Labels for Soluble Silicates - The draft labels sent to the committee June 8 were approved, with modification to the label for Sodium Orthosilicate, Anhydrous. These draft labels were prepared at a meeting of the task group held May 10 at the Pennwalt offices in Philadelphia. Attending were Messrs. Gormally (chairman), Lore, Overman, and Warren.

cc. Label for Antimony Oxide - Action was tabled pending a firm recommendation from the task group, which met May 25 at the MCA offices in Washington. Attending were Messrs. Sheldon (chairman), Gerber, Hurley, Vamos, and Hoover.

M. M. Hoover, Secretary

MMH:gr
June 26, 1972

cc: Board Liaison Committee-Environment
Distribution "A"