

ASSOCIATION OF BRITISH CHEMICAL MANUFACTURERS

Minutes (Unconfirmed) of the THIRTY-NINTH Meeting of the  
Marking of Containers Committee, held on Thursday, 3rd October,  
1963, at Cecil Chambers, 86 Strand, W.C.2.

Present:

|                             |                                      |
|-----------------------------|--------------------------------------|
| Mr. H.G. Rolfe (Chairman)   | The British Drug Houses Limited      |
| Mr. K.A. Samways            | Allen & Hanbury's Limited            |
| Mr. H. Burnham              | The Distillers Company Limited       |
| Mr. J.W. Crewe              | Monsanto Chemicals Limited           |
| Mr. P. Dyson                | Imperial Chemical Industries Limited |
| Mr. A.J. Holden             | A.B.C.M.                             |
| Mr. C.C. Stevens            | Imperial Chemical Industries Limited |
| Mr. S. Tuckwood             | A.B.C.M. Traffic Committee           |
| Mr. W.M. Diggle (Secretary) | Imperial Chemical Industries Limited |

In Attendance:

Mr. J.L. Denny                      A.B.C.M.

The Chairman welcomed Mr. Samways who would succeed him in the  
chair at the next meeting.

Apologies for absence were received from Mr. Bennister.

615: MINUTES OF LAST MEETING

The Minutes of the Meeting held on the 4th July, 1963 were con-  
firmed and signed.

616: MATTERS ARISING OUT OF THESE MINUTES

Ex-Minute 603 (ii) (b) - Manufacturers concerned had been informed of  
the agreement on wording for sulphur trioxide and titanium tetrachloride.

Ex-Minute 603 (a) - The Association's scheme and the position of the  
Council of Europe's 'Yellow Book' had been discussed with the editor of  
'Motor Transport' who had since printed a review of 'Marking of Containers'.

617: TECHNICAL WORDING (A) - (Mr. H.L. Bennister, Mr. H. Burnham  
and Mr. P. Dyson)

(i) Additional Substances

(a) Mr. Bennister had reported that data sheets had been issued  
in respect of:-

"Epicure" RTV - a proprietary curing agent  
Malononitrile  
Sodium pentachlorophenolate  
Sodium pentachlorophenolate solution.

(b) Consideration of malononitrile had followed a request from  
Roche Products Limited for comment on a label in English and  
German which was non-standard in layout and phraseology. It was  
the only product of theirs to which the scheme applied and they  
had declined to discuss it with the Secretary. They had however  
completed a data sheet, but at the same time had requested that no

further action be taken. Other firms listed as manufacturers were L. Light and Co. Limited and Whitmoyer-Reed Limited. The latter proposed to discontinue manufacture.

It was agreed that the Technical Wording Panel should study the data sheets and the wording proposed before a further approach was made to Roche Products Limited.

(ii) Technical Wording

(a) Warning wording agreed

Wording agreed with the manufacturers for the following products was approved:-

- allyl iodide
- ammonium ceric nitrate
- 3-bromopropyne
- carbon tetrabromide
- chloral hydrate
- 2:3-dichloro-1:4-naphthaquinone
- n-hexoic acid
- n-hexoic anhydride
- sodium hydrogen sulphate

Details are given in Appendix A.

(b) No warning wording required

The following had been considered but were not sufficiently hazardous to warrant inclusion in the scheme and were to be added to List 'B':-

- cadmium oxide
- cadmium sulphide
- cerous carbonate
- diaminoethanetetra-acetic acid
- 2-ethylhexyl acrylate
- lithium hypochlorite (30% solution)
- potassium sorbate
- sorbic acid

(c) Labels under discussion with manufacturers

- butyl acrylate
- dodecylbenzene sulphonic acid
- glycol ethers
- organic peroxides
- selenous acid

Dodecylbenzene sulphonic acid

The Railway Clearing House regarded this product as corrosive in itself and not because of the presence of free sulphuric acid. Marchon Products Limited had been informed but so far had not replied. The Chairman stated that the classification by the Railway Clearing House should not necessarily determine the Committee's action. If the Technical Wording Panel and the manufacturer did not agree with the Railway Clearing House, the Committee should support the manufacturer.

### Glycol ethers

Additional evidence found in the literature was being studied. The wording for 2-ethoxyethylacetate was also being reconsidered because of its possible vapour and skin absorption hazards.

### Organic peroxides

The Committee discussed the note circulated by Mr. Dyson (30.9.63) describing a meeting between representatives of Novadel Ltd., Laporte Chemicals Limited and Imperial Chemical Industries Limited and the Technical Wording Panel. It was agreed that this marked a step forward in the solution of the problem of labelling organic peroxides.

The Meeting had agreed to divide the peroxides into three categories with diminishing degrees of hazard, for the first of which the Technical Wording Panel had agreed to formulate an acceptable phrase describing the explosion hazard. The Committee commented on the length of the hazard phrase used by the L.A.P.I. Committee of M.C.A. which the manufacturers favoured and suggested that it might be split into a hazard and a precautionary phrase.

The Committee accepted that in the event of fire involving these materials copious supplies of water should be used to cool the peroxide. Accordingly, it was agreed that the hazard be described by "Highly Inflammable" or "Inflammable" as appropriate without a reference to miscibility with water.

Summing up the Chairman said that it was now clear that allowing for the fact that new phrases might have to be adopted, agreement on labels for these products would be reached in time.

#### (d) 4:4'Di-isocyanatodiphenylmethane

The Railway Clearing House had classified this material as a poison and it was agreed that the Shell Chemical Company be asked to provide data on the LD.50 so that this classification could be considered.

#### (e) Labels under discussion by the Technical Wording Panel

chloroacetamide  
endomethylenemethyltetrahydrophthalic anhydride +  
diethyloxalate  
malononitrile  
isobutyric acid  
antimony compounds  
cadmium compounds  
cerium compounds  
strontium compounds

Arising out of the discussion of antimony, cadmium, cerium and strontium compounds the Committee agreed that it was not possible to define more clearly what was meant by not passing commonly in commerce when this was used as a reason for not including a product in the scheme. A manufacturer had a duty to warn for example by letter, brochure or label, and the A.B.C.M. scheme had simplified the responsibility of manufacturers for

a large number of chemicals by providing a minimum standard of warning. If a product was in List 'B', it meant that in the opinion of a responsible trade association it did not warrant the application of the scheme. However, the fact that a chemical was not listed in the manual did not absolve the manufacturer from his common law duty. In law the question of whether or not a product passed commonly in commerce would be answered on the basis of the number of regular transactions rather than the total amount passing.

The Chairman agreed to obtain further information on the trade in certain inorganic salts.

(f) Use of CAUTION without a hazard phrase

This was acceptable to the Technical Wording Panel for special cases such as possible dermatitic effect as it was difficult in these cases to give a definite statement of hazard. This usage would have to be confined to exceptional cases, and it would be very difficult to explain in the manual yet avoid pressure to extend the usage. The Committee favoured the coining of a new phrase.

It was agreed that Mr. Dyson should discuss this with his medical officer and prepare a paper to be discussed at the next meeting when it was hoped Dr. Lloyd-Potter would be present.

(g) Zirconium

The discrepancies between the entries in the 'Blue Book' and the Manual had been raised by the Ministry of Transport. The 'Blue Book' entries made at the request of I.C.I. Limited were more recent than the entries in the Manual, and it appeared that practice has changed.

In the opinion of Imperial Metal Industries (Kynoch) Limited the first phrase in the label prescribed for "Zirconium Powder (Wet with Water)": "Keep container tightly closed; keep contents moist" was unsatisfactory and could be dangerous. Instead of the phrase "Keep contents moist" they suggested "Keep contents covered with water", or a similar phrase. The label in the ABCM Manual was prepared in 1955 before some of the fatal explosions had occurred in the United States and it might be, with the more complete knowledge we now had, that this particular label should be withdrawn. However, possibly the manufacturers who transported powder in this form had opposing views.

The Secretary was to confirm with F.W. Berk & Company Limited and Magnesium Elektron Limited that they no longer made zirconium in the forms listed in the Manual. Labels for other forms should then be discussed with Imperial Metal Industries Limited.

(h) Use of "flammable"

The Secretary and Mr. Holden had discussed this with Mr. Weston and Dr. Glass of the B.S.I. who were firm in their use of "flammable". At the same time they had sympathy with the

position of those who must comply with the Petroleum (Consolidation) Act, 1928. They were prepared to raise the matter with the Home Office in twelve to eighteen months' time after it had been a subject of discussion by the International Standards Committee in Delhi.

The Committee noted a report by H.M. Chief Inspector of Factories that legislation relating to the storage and use of flammable liquids was being drafted.

618: TECHNIQUES OF MARKING (B) - (Mr. J.W. Crewe)

Mr. Crewe reported that he had studied the relative strengths of white and brown card labels and that a white card label of sufficient strength for all purposes was available.

619: OPERATION AND DEVELOPMENT OF THE SCHEME (C) - (Chairman, Secretary and Mr. J.L. Denny)

(i) Application of the scheme to exports and imports

The paper prepared for submission to Council and the draft letter to members, both advising of the need to apply the scheme to this trade, were discussed. It was accepted that all the relevant facts were set out and the Chairman undertook to redraft them.

(ii) Liaison contacts with member firms

A list was circulated. 180 members were listed either as operating the scheme, or not doing so at the moment because they did not make hazardous chemicals coming within the scheme. A supplementary list was to be issued in due course.

(iii) U.S. labelling: ethylene glycol

A case recently brought against Union Carbide on the basis of inadequate warning was discussed. It was agreed that ABCM labels should not include a warning against remote risks. Hitherto ethylene glycol in normal use had been considered not sufficiently hazardous to warrant a label, although not discussed specifically by the Committee, and to apply a label might jeopardise the trade in "anti-freeze". No action was to be taken unless an approach was made by a manufacturer.

(iv) Disposal of empty containers

The Packaging Committee's request for a meeting of representatives of the two committees to discuss this was accepted in principle but the Secretary was to ask the Packaging Committee to state more specifically why they desired this meeting so that the Marking of Containers Committee could decide which of its members should attend.

620: LEGISLATION (D) - (Mr. C.C. Stevens)

(i) Butylphenols

The A.B.C.M. Manual, Marking Containers, contained entries for butylphenol and p-tert-butylphenol. The former had been in the first edition and the latter added by amendment sheet. At that time butylphenols were statutory poisons. Under the Statutory Instrument, 1960 No. 699 p-tert-butylphenol and others were exempted under Group II of the Third Schedule to the Poisons Act and were no longer statutory poisons. This had given rise to reconsideration of the entries in the Manual. Butylphenol was not shown as being manufactured by any member firm of A.B.C.M. and supposedly it was put into the first edition when the scheme was a recommendation to form a basic label for all butylphenols. It was agreed that this label be deleted entirely on the basis that the product did not pass in commerce and be added to List 'B'.

The p-tert-butylphenol label was based on butylphenol. It was no longer a statutory poison and therefore the poisons square and the words "Harmful if taken internally" no longer applied and should be deleted. The reference to food and food containers derived from statutory rules applying to phenol also no longer applied and should be deleted. This left the reference to skin, eyes and clothing, which was thought to be based on the properties of phenol rather than butylphenols. Reports from a manufacturer of the product stated that p-tert-butylphenol was not hazardous at all and had none of the corrosive properties of phenol itself. The Technical Wording Panel were to consider deletion of the label for p-tert-butylphenol from the Manual.

(ii) Amylnitrite

The wording in the Manual was wrong and should indicate the alternatives of POISON or WARNING together with "Harmful if taken Internally" in the latter case. However, it was questioned whether the product passed commonly in commerce. The Technical Wording Panel were to study this.

(iii) Sodium hydroxide - Report on a case against East Lancashire Chemical Company Limited

The Committee noted this case which emphasised the importance of labelling. Presumably the drums carried the statutory poison wording "Caution - this substance is caustic" and the case raised the question of how far a relatively uneducated person could be expected to extrapolate from the information given. "Open with Caution" would carry the advice further, but this would have to be applied to many other products and was not considered necessary.

621: PUBLICATIONS (E) - (Editorial Panel)

The British Drug Houses Limited had pointed out that cyclohexane was subject to the Petroleum Consolidation Act, 1928.

622: INTERNATIONAL AFFAIRS (F) - (Mr. A.J. Holden and Mr. C.C. Stevens)

- (i) Council of Europe: Sub-Committee on Industrial  
Safety and Health - Chemical Section

There was nothing to report under this heading.

- (ii) M.C.A.

Edited minutes of the 38th Meeting had been sent to M.C.A. Mr. Stevens reported on discussions with Mr. M. Crass and officials of the L.A.P.I. Committee when he visited the U.S.A.

623: TRANSPORT INTERESTS (G) - (Mr. S. Tuckwood)

The Committee were informed that a working group of I.M.C.O. had recommended an upper limit of flash point for classification as inflammable of 150°C closed cup and 140°C open cup. This meant that a number of substances now regarded as inflammable might not be so regarded in the future.

624: LIAISON WITH A.B.C.M. COMMITTEES (H) - (Chairman)

The Packaging Committee had asked whether the Marking of Containers Committee could organise a display showing the application of the scheme to various types of container at the 1964 Packaging Conference. It was agreed that Mr. Holden should reply at the next meeting of the Packaging Committee to the effect that the Committee were prepared to advise on such an exhibition but considered that the developments in packaging to be displayed were greater than those in labelling. The question was to be reconsidered when plans for the Conference were further advanced.

625: DATE OF NEXT MEETING

The next meeting was to be held on Thursday, 19th December, 1963.

ASSOCIATION OF BRITISH CHEMICAL MANUFACTURERS

MARKING CONTAINERS OF HAZARDOUS CHEMICALS

Wording agreed on 3rd October, 1963

ALLYL IODIDE

DANGER

HIGHLY INFLAMMABLE -  
IMMISCIBLE WITH WATER  
HARMFUL VAPOUR  
HARMFUL BY SKIN ABSORPTION

Avoid contact with skin, eyes and clothing.  
Keep away from heat, naked flames and sparks.  
In case of contact or spillage, drench with water;  
remove and wash contaminated clothing before  
re-use.  
For eyes, give prolonged irrigation with water and  
get medical attention immediately.  
In case of fire, use sand or earth.

AMMONIUM CERIC NITRATE

CAUTION

POWERFUL OXIDISING AGENT  
- ASSISTS FIRE

Keep contents dry.  
Keep away from heat, naked flames, sparks and acids.  
Avoid contact with skin, eyes and clothing.  
In case of contact or spillage, drench with water.  
For eyes, give prolonged irrigation with water and  
get medical attention immediately.  
In case of fire, drench with water.

3-BROMOPROPYNE

DANGER

HIGHLY INFLAMMABLE -  
IMMISCIBLE WITH WATER  
HARMFUL VAPOUR  
HARMFUL BY SKIN ABSORPTION

Keep away from heat, naked flames and sparks.  
Avoid contact with copper, lead and their salts.  
Avoid contact with skin, eyes and clothing.  
In case of contact, wash with soap and water; remove  
and wash contaminated clothing before re-use.  
For eyes, give prolonged irrigation with water and  
get medical attention immediately.  
In case of fire, use sand or earth.

CARBON TETRABROMIDE

CAUTION

HARMFUL VAPOUR

Avoid contact with eyes.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.

CHLORAL HYDRATE

**POISON** \*

HARMFUL VAPOUR

WARNING \*

HARMFUL IF TAKEN INTERNALLY \*

Avoid contact with skin, eyes and clothing.  
In case of contact or spillage, drench with water.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.

2:3-DICHLORO-1:4-NAPHTHAQUINONE

CAUTION

IRRITANT DUST

Avoid contact with skin, eyes and clothing.  
In case of contact, wash with soap and water.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.

n-HEXOIC ACID

CAUTION

CORROSIVE - CAUSES BURNS

Avoid contact with skin, eyes and clothing.  
In case of contact or spillage, drench with water.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.

n-HEXOIC ANHYDRIDE

CAUTION

CORROSIVE - CAUSES BURNS

Avoid contact with skin, eyes and clothing.  
In case of contact or spillage, drench with water.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.

SODIUM HYDROGEN SULPHATE

CAUTION

CORROSIVE - CAUSES BURNS

Avoid contact with skin, eyes and clothing.  
In case of contact or spillage, drench with water.  
For eyes, give prolonged irrigation with water  
and get medical attention immediately.