

Manufacturing Chemists' Association

OF THE UNITED STATES

(FOUNDED 1872)

608 WOODWARD BUILDING

WARREN N. WATSON
SECRETARY

WASHINGTON 5, D. C.

L-8

MINUTES OF MEETING

LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

Room 517, The Chemists' Club, 52 East 41st Street, New York City
10:00 A.M., Thursday, July 6, 1944

The meeting was called to order by Acting Chairman W. N. Watson at 10:00 A.M.

The following members were present:

Dr. T. Aalto	Mr. S. J. Hill
Dr. J. M. Carlisle (Alternate for Carl Anderson)	Dr. D. D. Irish
Dr. A. G. Cranch	Mr. R. W. Lahey
Mr. J. D. Gunther	Mr. R. W. Towne (Alternate for Lynn Watt)
Mr. Richard Hansen	Mr. W. N. Watson
Mr. L. L. Hedgepeth	

Guests: Mr. C. P. Davis, American Cyanamid Company
Mr. John Williamson, American Cyanamid Company
Mr. C. Johnston, U. S. Industrial Chemicals, Inc.

Committee Members Absent: Mr. Frank S. Low

PLAINTIFF'S
EXHIBIT
CMA-259

I. MINUTES OF MEETING

The minutes of the meeting of May 17, 1944 were approved as distributed.

II. CLASSIFICATION PATTERN

Each member was called upon to submit comments in full detail on the tentative classification pattern set forth in the minutes of the meeting of May 17, on pages 2, 3, and 4. Discussion developed the following points:

The basic hazards include (1) fire, (2) vapor, (3) dust, (4) skin contact and (5) oral intake, some products having only one, and other products more than one of these hazards.

It was agreed that complete coverage of all properties of all chemicals would lead to endless subdivisions. The classification should be limited because its primary function is as a guide. It was emphasized that the ultimate decision of the label to be adopted must be an individual one, depending upon the properties of the individual product.

The following changes in the classification were agreed upon:

- Provide for:
1. Solids, including irritant and toxic dusts.
 2. Oral intake.

3. Cumulative effects - such as lead and mercury.
4. Reference to gas masks as follows: "Use gas mask suitable for product, approved by U. S. Bureau of Mines."

It was unanimously agreed to ask Dr. A. G. Cranch to revise the first draft of the classification pattern on the basis of the suggestions submitted, sending such redraft to the Acting Chairman on or before July 11 for reproduction and transmittal to members of the Committee. Mr. Watson was also requested to review this revised draft with the Chemical Products Agreements Committee at its meeting on July 12, and to report the recommendations of the CPAC to the IAPI Committee. (See attached.)

Appointment of Labels Subcommittee. The Chairman was directed to appoint a subcommittee on labels to expedite the preparation of a list of recommended label caution statements. The following committee was appointed:

Richard Hansen, Chairman
 Carl Anderson
 S. J. Hill
 R. W. Lahey
 A. G. Cranch

A discussion of labels and related subjects developed the following points for consideration by the Labels Subcommittee:

Uniformity of precautionary information is desirable in order to effectively protect the user, and simplicity and clarity of the wordage of labels.

Single line cautions, sufficient to protect workmen.

Detailed instructions do not ordinarily belong on the label, but should be covered by leaflets on precautionary information or M.C.A. manuals from the manufacturer to the consumer.

Additional precautions to be covered by label for oxidizing and related agents; dangerous in contact with other chemicals or combustibles; may cause fire in contact with combustible products; product may decompose under heat to give irritant or toxic gases.

Storage cautions to include statement to keep away from heat, or food, or sunlight, according to the product.

While a single label in many instances is satisfactory for several products, in other cases it is necessary to have a separate label for the individual chemical product. The trend is toward the individual label.

Suggestion was made that standards for color schemes be considered to obtain a degree of emphasis between extreme, medium and mild hazard. The M.C.A. label design on C-5 label was distributed as an example of the M.C.A. standard.

The proper ratio of type size on the label is of great importance.

Use of different phrases such as "caution", "warning", and "danger" was suggested for study by the Label Subcommittee in order to stress different degrees of hazard.

It was agreed that the word "poison" was outmoded, with the general exception of caution for oral intake, and that its indiscriminate use would do more harm than good, the significant point being that cautions should be directed to the particular hazard, such as a skin irritant or toxicity of vapor.

State poison laws commonly call for the antidote for specified products in retail containers. For some products there is no antidote. For that, and other reasons, it is frequently desirable to use on bulk packages instead of the word "poison", the phrase "not for internal use".

The question of a positive statement on a label versus instructions was reviewed, further information to be obtained from legal sources on the relative advantages of each. For example, the choice between "corrosive to skin" and "if spilled on the skin wash hands with water", or the use of both phrases. Another type of positive statement frequently used is "for technical use only" or "for dry cleaning only".

It was agreed that some generally informative statement in a report to members for customers is desirable on flammables, bearing in mind, however, that labels are required by I.C.C., various laws and ordinances. A recommended precautionary statement for flammables, however, is desirable; attention to be called to safety regulations relative to fires and explosions, the need for use of approved electrical appliances and non-sparking tools, shoes without exposed steel nails, and avoidance of all sources of spark and flames.

Appointment of Product Subcommittees. The Chairman was requested to appoint subcommittees according to major chemical groups, or for any product which may require emergency treatment, such subcommittees to proceed with the development of precautionary label information for the products included within their scope. It was also agreed that the chairmen of such subcommittees be empowered to select and appoint other subcommittees for this purpose.

1. Subcommittee on Sodium Cyanide. The following subcommittee on sodium cyanide was appointed:

R. W. Lahey, Chairman
S. J. Hill
Richard Hansen

2. Caustic Soda. The Committee was advised that two companies had adopted a label for caustic soda drums, and that there was interest in this question on the part of other producers. The Chairman was requested to appoint a task force to proceed with the preparation of a precautionary label for caustic soda.

III. DDT

Attention of the members was called to a letter sent to each of them, dated June 8, containing the label recommended by DDT producers and prepared at their meeting of May 24. It was emphasized that the label was a tentative one in recognition of the fact that more information would be available in the near future on properties of DDT. No recommendations were submitted for revision of this label.

IV. OXALIC AND FORMIC ACID

Mr. S. J. Hill, Chairman of the Subcommittee on this subject, reported the following recommendations:

1. That the M.C.A. label C-5 be used for carboys containing formic acid.
2. That a similar label be prepared for use on barrels, bearing in mind the problem of possible leakage from these wooden containers.

It was agreed that the subject of this new label for barrels be referred to the Poisonous Articles and Miscellaneous Packages Committee, Mr. Hill and Mr. Gillet to supply suggestions to them. Such a barrel label might also be appropriate for certain other products shipped in wooden barrels.

Mr. Hill also reported the draft of a label for oxalic acid in bulk containers, with alternate suggestions for phraseology. Suggestions were made to Mr. [redacted] and he was requested to submit a final report to the LAPI Committee.

V. PHOSPHORUS AND PHOSPHORUS COMPOUNDS

Mr. Watson reported on behalf of T. Pat Callahan, Chairman of this Subcommittee, that Mr. Callahan had written the producers of these products and that the matter was under consideration although final recommendations had not been formulated.

VI. CHEMICAL PRODUCTS AGREEMENTS COMMITTEE

For the information of the Committee, the Acting Chairman advised that a meeting of the Chemical Products Agreements Committee of the U. S. Public Health Service would be held on July 12, at which the subject of precautionary labels will be reviewed and proposals from the American Hygiene Association will be considered.

It was reported that an additional label had been adopted by producers of aniline, supplementary to the label under the agreement with the U.S. Public Health Service. The Chairman suggested that the language of the new label could be incorporated as an amendment of the agreement, and thus eliminate an extra label. Dr. Irish agreed to submit to the Chairman a copy of the extra label referred to.

VII. AMERICAN PHYTOPATHOLOGICAL SOCIETY

The Chairman reported that he had held a conference on June 27 with Messrs. F. Howard (R. I. State College) and J. G. Horsfull (Conn. Experimental Station), at which they requested sources of information on the hazardous properties of new insecticides and fungicides, as a guide in their application. The Chairman had suggested that this information should be obtained from the producer of the new product.

Discussion developed that frequently requests come from the experiment stations and others for samples of new products, and old products for new uses, on which the toxicological tests have not been completed. It was agreed that a preliminary precautionary statement on such experimental samples is desirable, and the following Subcommittee was appointed to prepare a recommended precautionary statement:

D. D. Irish, Chairman
S. J. Hill
R. W. Lahey

VIII. SAMPLES OF PRODUCT LABELS

It was unanimously agreed that each member would promptly send to the Chairman, fifteen copies of each of ten to twenty selected product labels now used by their respective companies, including products which carry different hazards in the organic and inorganic groups.

IX. USE OF CODES

Some customers have requested that hazardous chemicals may be shipped under code. It was agreed that this was undesirable and may involve risk to the user and liability to the shipper. It was suggested that the matter be called to the attention of the executives through an appropriation letter, Mr. Hansen to submit a draft to W. N. [redacted].

IX. MISCELLANEOUS

The Chairman advised that he had been able to obtain from the Office of the Surgeon of the Air Service Command, a sufficient number of copies of the two following

for loan to each member of the IAPI Committee, and that he was endeavoring to obtain a copy for each member of the Association:

1. Industrial Hygiene Manual (90 pages).
2. Supplement No. 1 (34 pages).

There being no further business, the meeting adjourned.

WARREN N. WATSON

Acting Chairman

Minutes Subject to Approval.

July 11, 1944

REVISED DRAFT FOR CLASSIFICATION OF CHEMICAL
PRODUCTS FOR PRECAUTIONARY LABELING

Flammable materials:

Brief statement such as:

WARNING! FLAMMABLE MATERIAL KEEP AWAY FROM FLAME OR
EXCESSIVE HEAT.

(Use to be determined according to highest local requirements for such
labeling and to conform to such requirement.)

1. Vapors immediately toxic or extremely irritant even on short exposure or to low
concentrations. (E.g. Hydrogen sulphide, hydrogen cyanide, hydrogen fluoride, phos-
gene, chlorine, arsine, ammonia, formaldehyde, etc.):

DANGER! VAPORS VERY HAZARDOUS.
DO NOT INHALE. IN EMERGENCY USE GAS MASK APPROVED BY
U. S. BUREAU OF MINES FOR PURPOSE, OR AIR LINE
RESPIRATOR. AVOID CONTACT WITH SKIN OR EYES.

2. Vapors hazardous from prolonged or repeated exposures, or from higher concentra-
tions. (E.g. Chlorinated hydrocarbons, aromatic hydrocarbons, aniline, nitrogen
compounds, etc.):

WARNING! VAPORS HARMFUL.
AVOID BREATHING HIGH CONCENTRATIONS, OR PROLONGED
EXPOSURE TO LOW CONCENTRATIONS. USE ONLY WITH
GOOD VENTILATION.

3. Vapors physiologically inert. (E.g. Acetylene, nitrogen, helium, carbon dioxide,
methane, propane, etc.):

CAUTION! SUFFOCATING VAPORS.
VERY HIGH CONCENTRATION MAY HARMFULLY REDUCE OXYGEN
FOR BREATHING. USE WITH GOOD VENTILATION.

4. Hazardous dusts. (E.g. Lead and some other metals, fluorides, arsenicals, caustics,
chrome salts, etc.):

CAUTION! DUST FROM THIS MATERIAL MAY BE HARMFUL.
PREVENT SCATTERING OF DUST. AVOID BREATHING OR
SKIN CONTACT.

5. Skin irritants - corrosive. (E.g. Mineral acids, some organic acids, caustics,
etc.):

DANGER! CORROSIVE TO SKIN AND EYES.
AVOID CONTACT. IN CASE OF CONTACT, IMMEDIATELY
FLUSH THOROUGHLY WITH PLENTY OF WATER.

6. Skin irritant, after repeated or continued contact. (E.g. Fat solvents like
chlorinated hydrocarbons, ketones, esters, ethers, alcohols, also amines, etc.):

CAUTION! MAY BE IRRITATING TO SKIN.
AVOID LONG CONTINUED OR FREQUENTLY REPEATED CONTACT.

... Skin penetration toxic. (E.g. ethylene chlorhydrin, aniline, crotonaldehyde and to some extent, benzol, methanol, some amines, etc.).

WARNING! DANGEROUS AMOUNTS MAY BE ABSORBED THROUGH THE SKIN.
AVOID SKIN CONTACT. IF CLOTHING IS WET WITH MATERIAL
REMOVE AT ONCE. WASH THOROUGHLY WITH SOAP AND WATER
ANY SKIN AREAS WHICH MAY HAVE BEEN WET.

... Toxic if taken internally. (Wide variety of products covered by various poison laws. Would apply to materials covered by statutory definition of poison, "dangerous to human life in doses of 60 grains or less" (4 gms.), or to any material toxic in amounts likely to be taken through easily anticipated errors, through kind of use.)

WARNING! MAY BE HARMFUL IF SWALLOWED.
DO NOT TAKE INTERNALLY.