

Manufacturing Chemists Association

MINUTES OF MEETING

LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

May 26-27, 1970

American Cyanamid Conference Room New York, N. Y.

Members Present

R. F. Philpitt, Chairman	Olin Corporation
G. R. Sido, Vice Chairman	Monsanto Company
R. C. Andrews (for E. J. Masek)	Diamond Shamrock Corporation
H. A. Birnbaum	3 M Company
L. W. Burnette	GAF Corporation
C. U. Dernehl	Union Carbide Corporation
R. H. Dewey	Commercial Solvents Corporation
E. M. Dixon	Celanese Corporation
J. T. Gormally	Pennwalt Corporation
J. W. Hammond	Enjay Chemical Company
E. J. Hogan	Allied Chemical Corporation
W. H. Jones	Eastman Kodak Company
H. H. McIntyre	The Dow Chemical Company
D. G. MacKellar	FMC Corporation
C. J. O'Connor (5/26)	Stauffer Chemical Company
R. E. Rutherford	Gulf Oil Corporation
C. B. Shaffer	American Cyanamid Company
A. W. Sheldon	M&T Chemicals Inc.
F. D. Sparre	E. I. du Pont de Nemours & Company
R. G. Troup	J. T. Baker Chemical Company
N. E. Wendt	American Potash & Chemical Corporation
M. M. Hoover, Secretary	MCA Staff

Guests Present

Martin Martino	M&T Chemicals Inc.
R. M. Maxwell	U.S.S. Chemicals
P. E. Neiman	Enjay Chemical Company
Peggy Walton (5/26)	MCA Staff

Members Absent

D. E. Brown	Mallinckrodt Chemical Works
W. L. Hammond	PPG Industries, Inc.
E. J. Masek	Diamond Shamrock Corporation
N. G. White	Shell Chemical Company

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1. MEETINGS

a. Minutes of Last Meeting - Minute 3b of the minutes of the January 20-21, 1970 meeting was corrected so that in the last line it now reads "declaration for motor oil, paints, and antifreeze" rather than "declaration for industrial products." Also, Minute 2d (second paragraph) was clarified by mention of the fact that regulations under the Walsh-Healey Act providing for use of the DOI Material Safety Data Sheet have not yet been promulgated. Otherwise, the minutes were approved as distributed.

b. Next Meeting - It was decided to hold the next meeting September 16-17, 1970 in the American Cyanamid Company conference room, Time-Life Building, New York.

2. LIAISON ACTIVITIES

a. MCA Inter-Committee Task Group on Transportation Hazards Information - After a preliminary discussion of the NFPA proposal concerning a marking system for vehicles, about which the secretary sent a communication dated April 16 to the committee on May 18, the chairman appointed a task group consisting of Messrs. Dewey (chairman), McIntyre, and Sido to develop wording for requested committee comments. The wording developed by the task group (as contained in its report dated May 26) was distributed to the committee later in the meeting, at which time it approved unanimously for transmittal to the MCA representative to the involved NFPA subcommittee.

The April 16 communication was originally sent to members of the Inter-Committee Task Group on Transportation Hazards Information by the MCA representative, with a request that comments be obtained from the respective committees by June 1. Prior to consideration of this item at the May 26-27 meeting, the secretary relayed to the committee the comments of the LAPIC representative to the

Inter-Committee Task Group, who had to cancel his plans for attending the meeting at the last minute.

b. National Fire Protection Association - Mr. McIntyre reported that he had nothing further to add to his report of May 14, which was mailed to the committee May 18.

c. Compressed Gas Association - The secretary reported that the proposed revision of CGA Pamphlet C-7 "A Guide for the Preparation of Precautionary Labels for Compressed Gas Containers" was mailed to the committee February 26. Following a brief discussion, during which it was pointed out that the differences between the MCA and CGA guides should be ascertained even if nothing else is done, the chairman urged that comments from committee members concerning the CGA document be sent to Dr. White for consolidation.

d. Chemical Industries Association Ltd. - The secretary reported that he has received a dozen copies of the new CIAL labeling manual, and determined that all members wished a copy. He therefore agreed to request additional copies.

e. Chemical Specialties Manufacturing Association - Mr. Hogan reported on the May 17 meeting of the CSMA Labeling and Regulatory Advisory Committee.

f. Inter-Industry Advisory Committee on Product Information - Mr. Hogan reported that there has been no recent activity within this committee.

g. European Economic Commission - Mr. Hogan reported that the effective date for the June 27, 1967 and March 13, 1969 EEC directives concerning the classification, packaging, and labeling of dangerous substances has been postponed until January 1, 1971.

He also reported that changes have been made to Articles 3 through 10 of the June 27, 1967 directive involving different names for classifications and new language for some of the statements, and recommended that a copy of Commerce Clearing House Report No. 130 (March 20, 1970) which lists these changes be obtained from company legal departments.

The committee approved his recommendation to discontinue providing copies of directives in this area.

h. Association of American Pesticide Control Officials - Mr. Sparre reported that the reaction of state officials to the

proposed amendment to FIFRA to provide for federal pre-emption was covered in the report of the May 17 CSMA meeting, and that the annual meeting of AAPCO will be held in Louisville the week of August 3.

i. Industry Committee on Weights and Measures - Mr. Sparre reported that the request for an exemption from dual declaration for motor oil, paints, and antifreeze has been accepted by the Laws and Regulations Committee, and that this exemption will presumably become a part of the model state regulations.

j. National Paint, Varnish, and Lacquer Association - Mr. Sparre reported that NPVLA's main concern is now with lead-based paints in old homes.

k. American Petroleum Institute - Mr. Hammond reviewed his report of May 13 which was mailed to the committee May 18.

l. American Congress of Governmental Industrial Hygienists - Mr. Hammond reviewed his report of May 13 which was mailed to the committee May 18. He added that Dr. Stockinger will provide background information supporting the change or addition of a new substance to the Threshold Limit Values list upon request.

m. Department of Transportation - Mr. O'Connor reported that his liaison group submitted comments concerning DOT Docket No. HM-42, Notice No. 70-3, which proposed a new hazard classification for Combustible Liquids. These comments, along with others, formed the basis for the MCA statement of April 22 which was mailed to the committee April 23.

He also referred to a DOT draft Request for Public Advice on Classification of Corrosives, about which MCA had been requested to submit preliminary comments, and for which DOT had requested no more than a strictly limited distribution. Dr. Shaffer pointed out that the DOT draft attempted to relate two incompatible primary irritation indexes which would have the effect of including irritants among regulated substances. This concern about irritants was expressed in the MCA reply of May 6 to DOT.

The secretary was requested to inform the committee of all transportation matters in which it has a concern.

n. Department of Labor - The secretary reviewed the draft reply to DOL concerning Mr. Gidel's proposal that MCA, as sponsor of the American National Standards Institute Z129 project, seek

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the development of an American National Standard incorporating the DOL Material Safety Data Sheet, the NFPA 704M Information and Warning Signal, and MCA Precautionary Labels.

It was agreed that the MCA reply to DOL should incorporate the points made in the report of the March 10 and May 5 meetings of the Pictorial Labeling Task Group which was mailed to the committee May 15, and that the progress of the Pictorial Labeling Task Group as recorded in this same report should be included in the reply to DOL, along with a request for DOL comments on the MCA pictorial labeling work to date.

3. LABELS FOR PUBLISHED SAFETY DATA SHEETS

In response to the vote of the committee at the January 20-21 meeting to review all except the most recently published data sheet labels and to revise them as necessary to bring them into accord with the seventh edition of Manual L-1, the secretary sent folders from MCA files for the involved chemicals to task groups appointed by the chairman. The MCA file data was supplemented by data on a wide range of chemicals supplied by Dr. Dernehl and Mr. McIntyre, and by data received from various sources on individual chemicals.

Computer printouts (approximately 65) of labels for a large portion of the involved chemicals were furnished by Dr. Shaffer and distributed to the committee at the May 26-27 meeting. These printouts were made according to the Checklists for Label Preparation as submitted by those who filled out the checklists, and as derived from the relatively small number of labels that were submitted as such with the exception of one batch received too late for processing.

The most recently published data sheet labels were not included in the review since they were prepared according to the seventh edition of Manual L-1.

Action was taken on some of the label printouts which were distributed at the May 26-27 meeting as follows:

a. Label for SD-1 (Formaldehyde) - It was voted unanimously to adopt the printout label as modified at the meeting. See Appendix A to these minutes for the adopted label. Available data permitted writing a label for the methanol-free grade only.

b. Label for SD-2 (Benzene) - It was voted unanimously to

adopt the printout label as modified at the meeting. See Appendix B to these minutes for the adopted label.

c. Label for SD-3 (Carbon Tetrachloride) - It was voted unanimously to adopt the printout label as modified at the meeting. See Appendix C to these minutes for the adopted label.

d. Label for SD-4 (Phenol) - It was voted unanimously to adopt the printout label as modified at the meeting. See Appendix D to these minutes for the adopted label.

e. Label for SD-5 (Nitric Acid) - After some discussion of the printout label, it was decided to consider it further at the next meeting.

f. Label for SD-6 (Paraformaldehyde) - It was agreed to table action on the printout label pending clarification of information in the data sheet, particularly with respect to hazardous properties attributed to the monomer as distinct from the lower polymers.

g. Label for SD-40 (Methyl Chloride) - It was voted unanimously to adopt the printout label as modified at the meeting. See Appendix E to these minutes for the adopted label.

4. LABELS FOR UNPUBLISHED SAFETY DATA SHEETS

Action taken on labels for data sheets yet to be published is recorded below. Drafts of these data sheets have been recently received from the Safety and Fire Protection Committee. They represent revisions to existing data sheets with the exception of the draft for a data sheet on Nitrocellulose.

a. Label for SD-25 (Hydrofluoric Acid) - The committee reviewed the January 19, 1970 draft of a label for Anhydrous or Aqueous Hydrofluoric Acid which had not been acted upon at the January 20-21 meeting because of the question of proper terminology for the quaternary ammonium chloride compound used in treating burns to skin.

It was agreed that the first-aid statement for inhalation should be changed to read "If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing, give oxygen as soon as possible."

It was also agreed that the task group should revise the first-aid statement for skin contact and have it sent to the committee for letter ballot.

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b. Label for SD-37 (Styrene Monomer) - The January 1970 draft for a revised data sheet was sent to the task group appointed to review a group of 10 data sheet labels including that for Styrene monomer per Minute 3. No checklists or label drafts were received from this task group for review at the May 26-27 meeting, so no action on the label could be taken.

c. Label for SD-40 (Methyl Chloride) - The February 1970 draft for a revised data sheet was sent to the task group appointed to review another group of 10 data sheet labels including that for methyl Chloride per Minute 3. As recorded in Minute 3g, it was voted unanimously at the May 26-27 meeting to adopt the printout label as modified at this meeting. See Appendix E to these minutes for the adopted label.

d. Label for SD-XX (Nitrocellulose) - Mr. Sparre reported that it would be necessary to have an improved draft of the proposed data sheet for Nitrocellulose (Wet Types) to write a label.

5. OTHER COMMITTEE PROJECTS

a. Pictorial Labeling - Mr. Sido reviewed the results of the work of the Pictorial Labeling Task Group to date, as described in the report of the March 10 and May 5 meetings of the task group which was mailed to the committee May 15. It was voted unanimously to present the results of the task group work to DOL on a tentative basis for discussion purposes.

As reported in Minute 2n above, it was also agreed that this presentation should be a part of the reply to DOL in connection with the DOL proposal to MCA for the development of an American National Standard incorporating the DOL Material Safety Data Sheet, the NFPA 704M Information and Warning Signal, and MCA Precautionary Labels.

b. ANSI Standard for Manual L-1 - The secretary reported on the nature of comments received to date in connection with the canvass of 31 organizations to obtain a consensus for adoption of the MCA Guide to Precautionary Labeling of Hazardous Chemicals as an American National Standard. He mentioned that the cut-off date for the canvass is July 31, and that the comments associated with several negative votes centered about the definitions for combustible liquid, flammable liquid, and flammable gas.

It was decided that work towards resolution of the negative comments should begin immediately, and that the chairman would appoint a task group for this purpose.

c. Military Standard for Symbols - Mr. Sido reported that he had nothing further to report on MIL-STD-1341, concerning which MCA submitted comments to the U.S. Navy November 19, 1969.

d. Committee Operating Procedures - The secretary read Mr. Masek's letter of May 25 to the chairman which reported on his discussion with MCA Staff Counsel concerning membership rotation.

It was decided to request the secretary to send a copy of all operating procedures for MCA committees which include specific rotation provisions to the task group for their review.

e. Notes to Physicians - Dr. Shaffer reported that he had been appointed chairman of a task group, which also included Drs. Dernehl and Jones, to formulate a reply to an FDA inquiry regarding the Notes to Physicians section of the seventh edition of Manual L-1. After some discussion, it was agreed that Dr. Shaffer would work with the secretary to finalize the reply.



M. M. Hoover, Secretary

MMH:gr
June 1, 1970

Distribution "A"
cc: Board Liaison Committee - Environment

Attachments: Appendices A thru E

APPENDIX A

Minutes of the May 26-27, 1970 Meeting of the
MCA Labels and Precautionary Information Committee

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FORMALDEHYDE (METHANOL-FREE)

DANGER ! MAY BE FATAL IF ABSORBED THROUGH SKIN
HARMFUL IF INHALED
CAUSES SEVERE EYE BURNS AND SKIN IRRITATION
MAY CAUSE ALLERGIC SKIN REACTION

Do not get in eyes, on skin, on clothing.
Avoid breathing vapor, mist.
Keep container closed.
Use with adequate ventilation.
Wash thoroughly after handling.

☒ POISON ☒
Call a Physician

FIRST AID: In case of contact, immediately flush eyes or skin
with plenty of water for at least 15 minutes while removing
contaminated clothing and shoes. Wash clothing before re-use.

If inhaled, remove to fresh air. If not breathing give arti-
ficial respiration, preferably mouth-to-mouth. If breathing
is difficult, give oxygen.

SPILL OR LEAK: Flush spill area with water spray.

MCA Chemical Safety Data Sheet SD-1 available.

APPENDIX B

Minutes of the May 26-27, 1970 Meeting of the
MCA Labels and Precautionary Information Committee

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BENZENE

DANGER ! EXTREMELY FLAMMABLE
HARMFUL IF INHALED

Keep away from heat, sparks, and open flame.
Avoid breathing vapor.
Avoid prolonged or repeated contact with skin.
Keep container closed.
Use with adequate ventilation.

☒ POISON ☒
Call a Physician

FIRST AID: If inhaled, remove to fresh air. If not breathing
give artificial respiration, preferably mouth-to-mouth. If
breathing is difficult, give oxygen.

FIREFIGHTING: In case of fire, use water spray, foam, dry
chemical, or carbon dioxide.

SPILL OR LEAK: Soak up spill with sand or earth.

MCA Chemical Safety Data Sheet SD-2 available.

APPENDIX C

Minutes of the May 26-27, 1970 Meeting of the
MCA Labels and Precautionary Information Committee

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CARBON TETRACHLORIDE

DANGER ! MAY BE FATAL IF INHALED OR SWALLOWED
HARMFUL IF ABSORBED THROUGH SKIN

Do not breathe vapor.
Avoid contact with eyes, skin, and clothing.
Keep container closed.
Use only with adequate ventilation.
Wash thoroughly after handling.
Do not take internally.

☒ POISON ☒
Call a Physician

FIRST AID: If inhaled, remove to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen.

If swallowed, induce vomiting by sticking finger down throat or by giving soapy or strong salty water to drink. Repeat until vomit is clear. Never give anything by mouth to an unconscious person.

In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Wash clothing before re-use.

SPILL OR LEAK: Flush spill area with water spray.

MCA Chemical Safety Data Sheet SD-3 available.

APPENDIX D

Minutes of the May 26-27, 1970 Meeting of the
MCA Labels and Precautionary Information Committee

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PHENOL

DANGER ! MAY BE FATAL IF ABSORBED THROUGH SKIN
RAPIDLY ABSORBED THROUGH SKIN
CAUSES SEVERE BURNS
HARMFUL IF SWALLOWED OR INHALED

Do not get in eyes, on skin, on clothing.
Avoid breathing vapor.
Keep container closed.
Use with adequate ventilation.
Wash thoroughly after handling.

☒ POISON ☒
Call a Physician

FIRST AID: In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Wash clothing before re-use.

If swallowed, induce vomiting by sticking finger down throat or by giving soapy or strong salty water to drink. Repeat until vomit is clear. Never give anything by mouth to an unconscious person.

If inhaled, remove to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen.

FIREFIGHTING: In case of fire, use water spray, foam, dry chemical, or carbon dioxide.

SPILL OR LEAK: Remove solid to extent possible and flush area with water.

MCA Chemical Safety Data Sheet SD-4 available.

APPENDIX E

Minutes of the May 26-27, 1970 Meeting of the
MCA Labels and Precautionary Information Committee

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METHYL CHLORIDE

DANGER ! EXTREMELY FLAMMABLE
ODORLESS LIQUID AND GAS UNDER PRESSURE
HARMFUL IF INHALED

Keep away from heat, sparks, and open flame.
Avoid breathing gas.
Use with adequate ventilation.
Avoid contact with skin.
Never drop cylinder.
Keep cylinder out of sun and away from heat.

FIRST AID: If inhaled, remove to fresh air. If not breathing
give artificial respiration, preferably mouth-to-mouth. If
breathing is difficult, give oxygen. Call a physician.

FIREFIGHTING: In case of fire, allow gas to burn if flow cannot
be shut off immediately.

SPILL OR LEAK: Keep upwind of leak. Evacuate enclosed places
until gas has dispersed.

MCA Chemical Safety Data Sheet SD-40 available.