

MANUFACTURING CHEMISTS ASSOCIATION
MINUTES OF MEETING
LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

Stouffer's National Hotel Arlington, Virginia

May 26, 1976

Mr. Charles J. O'Connor presided and convened the meeting
at 10:00 AM. The following attended:

MEMBERS PRESENT

C. J. O'Connor, Chairman	Stauffer Chemical Company
W. H. Jones, Vice Chairman	Eastman Kodak Company
G. S. Batchelor	Virginia Chemicals Inc.
H. A. Birnbaum	3 M Company
L. W. Burnette	GAF Corporation
C. U. Dernehl	Union Carbide Corporation
R. H. Dewey	IMC Chemical Group, Inc.
Fred Holler (a)	Allied Chemical Corporation
Robert Jelus	MC/B Manufacturing Chemists
M. B. Lore	E. I. du Pont de Nemours & Co.
J. S. Mackay	USS Chemicals - U. S. Steel
D. G. MacKellar	FMC Corporation
R. F. Philpitt	Olin Corporation
R. E. Rutherford	Gulf Oil Corporation
W. L. Schleyer	Philadelphia Quartz Company
C. Boyd Shaffer	American Cyanamid Company
A. W. Sheldon	M&T Chemicals Inc.
G. Robert Sido	Monsanto Company
Phillip Sonneborn	Fisher Scientific Company
C. J. Stroemple	PPG Industries, Inc.
R. G. Troup	J. T. Baker Chemical Company
J. V. Urenovitch	Air Products & Chemicals Inc.
A. G. Wheeler	ICI United States Inc.
H. B. Woolfalk (b)	Diamond Shamrock Corporation
J. T. Seawell, Secretary	MCA Staff

(a) For J. R. Taylor
(b) For R. Craig Andrews

Members Absent

S. W. Beckstead
 C. P. Brush
 E. M. Dixon
 J. W. Hammond
 R. F. Ingham
 T. R. Madden

Kerr-McGee Chemical Corporation
 Koppers Company Inc.
 Celanese Corporation
 Exxon Chemical U.S.A.
 Mallinckrodt Inc.
 Reichhold Chemicals Inc.

Guests Present

D. V. Anderson
 Delmar Billings
 Rita Bogoroch

J. J. Bonin
 A. G. Chasar
 J. G. Contino
 Howard Cunningham
 P. G. Elsey
 R. L. Finocchio
 R. F. Gold
 E. L. Lewis
 J. F. Lemen
 J. P. Rakus
 J. J. Trexel
 Jack Turer
 Anne Waggoner
 R. A. Williams
 Frank Yanno

Amoco Chemicals Corporation
 MC/B Manufacturing Chemists
 Environmental Health Centre
 National Health & Welfare
 Shell Chemical Company
 Mobil Chemical Company
 Dow Chemical U.S.A.
 Witco Chemical Company
 Ethyl Corporation
 PPG Industries, Inc.
 Stauffer Chemical Company
 ARCO Polymers Inc.
 Hooker Chemicals & Plastics Corp.
 Dart Industries, Inc.
 E. I. du Pont de Nemours & Co.
 Witco Chemical Company
 MCA Government Relations Dept.
 IMC Chemical Group, Inc.
 Eastman Kodak Company

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1.0 Introduction of Guests2.0 Approval of the Minutes of the January 28, 1976 Meeting

The minutes of the January 28, 1976 meeting were approved after making the following revisions:

2.1 Manual Revision Subcommittee

Mr. Thomas R. Madden, Reichhold Chemicals is to be added to the roster of the Manual Revision Subcommittee.

2.2 Phraseology on Labels Regarding Medical Assistance
(Section 8.2, pages L-813, L-814 of January 28, 1976 Meeting)

The phrase "Call a Physician at Once" is to be changed to read, "Call a Physician."

2.3 Explorations into the International Implications of the ANSI Standard Z129.1 - Formation of Subcommittee

The missions of this Subcommittee have been modified to read as follows:

Section 4.0

The Chairman requested that Mr. G. Robert Sido submit the new ANSI Standard Z129.1 to key Monsanto representatives and their associates in Europe for their consideration of the document as a possible international standard on precautionary labeling.

Following initial assessment of European reactions, the Subcommittee is requested to make recommendations for LAPI action.

Section 4.1

International Transportation Hazard Classification. Mr. Sido was asked to form a Subcommittee to determine whether or not a comparison is available on U. S. and International Transport Hazard Classification of Industrial Chemical Products. If none exists, the group should make recommendations on ways to develop it as a tool to promote uniformity in labeling and marking.

3.0 Manual Revision Subcommittee Report

The overall objective of this Subcommittee was the development of recommendations for the future course of Manual L-1, Guide to Precautionary Labeling of Hazardous Chemicals for the consideration of the full Committee.

One of the Subcommittee's principal objectives was to outline a scope for Manual L-1 which would recognize the existence of ANSI Standard Z129.1 as a valuable asset to those concerned with precautionary labeling.

During the Subcommittee's deliberations, due consideration was given to the ongoing needs of the chemical industry under present and proposed regulations.

Using the foregoing objectives, the Subcommittee prepared a five-point program which is proposed as a core of a Manual L-1 work program.

An outline of the five-point program developed is as follows:

General Outline of Manual L-1 (Proposed)

- A. ANSI Standard Z129.1
- B. How to Develop a Label Text
- C. Government Requirements and Proposals
- D. Other Standards of Care
- E. Customer/User Literature

Section A - ANSI Standard Z129.1

A copy of Z129.1 in loose-leaf form would appear as the first section in the proposed Manual.

Section B - How to Develop a Label Text

This section of the new Manual would contain text similar to that in Manual L-1 describing the individual steps to be taken in writing a label.

Section C - Government Requirements and Proposals

This section of the Manual would provide a general scope of each of the acts and regulations which are known to be applicable to labeling and container markings. It would also include a list of sources of the regulations (Federal Register, Code of Federal Regulations, etc., etc.). Pages 9 and 10 of the 1970 Edition provide an introduction to this section.

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This section could include references to the Department of Transportation requirements and any marking system it might adopt, IMCO Labeling, EEC and other foreign requirements.

Section D - Other Standards of Care

This section would contain broad-based considerations of additional standards of care and related subject matters such as container disposal, pictorial (photographic) symbols, and additional toxicological properties such as chronic health hazards. This area could also advise the reader of related hazard information systems found in the CHEMTREC system (ChemCards) and signs and placards for specific and general chemical hazards.

Section E - Customer/User Literature

This section will advise the Manual user that literature can become labeling under various regulations. All forms of such literature should be consistent among themselves and with package labeling. Examples include Material Safety Data Sheets, Chemical Safety Data Sheets, Proprietary Data Sheets, Product Information, and Technical Data Sheets.

The motion was made, seconded, and passed to accept the report and recommendations of the Subcommittee as presented.

3.1 Items for Consideration During Possible Subsequent Revisions in Manual L-1 and the ANSI Standard Z129.1

Discussions regarding this subject centered about the following:

- (1) A revised Manual L-1 must be kept under continuing review. A recommendation was made that this might be accomplished by means of a standing Manual Revision Subcommittee together with standing Task Groups for each of the sections described under the five-point Manual Revision Program.
- (2) Those sections of either a revised Manual L-1 or Z129.1 which treat Government regulations will require constant surveillance and updating.

- (3) Further considerations should be given to "referencing test methods" when developing a label, i.e., on what test are label recommendations being based.
- (4) It appears as though general definitions will not be sufficient in the future. For example, a more definite definition should be written for the term "corrosive."

Apropos of the subject of definitions is Appendix I containing definitions and recommendations presented for the consideration of the LAPI Committee by Dr. C. B. Shaffer. Dr. Shaffer's recommendations, while intended primarily for a subsequent revision of the ANSI Standard Z129.1, can apply also to future revisions in Manual L-1.

4.0 Status of the Work of the Inter-Committee Task Group on Hazard Information System

Dr. Warren Jones reported that the Task Group had completed its action and a letter report was submitted to the Department of Transportation on March 16, 1976.

5.0 Report on Section 2 for the ANSI Standard Z129.1 to be Prepared by the Compressed Gas Association

Dr. Warren Jones was appointed by the Chairman to conduct appropriate liaison with Mr. Robert E. Lenhard, Managing Director of the Compressed Gas Association (CGA).

During a telephone call to Mr. Lenhard which was placed immediately prior to the LAPI meeting, Dr. Jones was informed of the action taken to date by CGA. He was further advised that a letter would be sent to him summarizing Mr. Lenhard's "verbal progress report."

Immediately following the LAPI meeting, Dr. Jones received from Mr. Lenhard a letter dated June 4, 1976, subject: Precautionary Labeling of Compressed Gas Containers, CGA Docket C-7-1971 in which answers to outstanding questions were confirmed in writing. Mr. Lenhard's letter of June 4th is made a part of these minutes and is presented as Appendix II.

6.0 Subcommittee Progress Reports and Committee Decisions
and Actions on the following:

6.1 Hydrogen Peroxide

The Subcommittee on Hydrogen Peroxide has been restructured and currently consists of the following:

Mr. D. J. MacKellar	FMC Corporation
Mr. J. J. Bonin	Shell Chemical Company
Mr. J. J. Trexel	E. I. du Pont de Nemours
Mr. R. L. Finocchio	PPG Industries, Inc.

Test data are not as yet in report form. These data will be made available to the Subcommittee at the earliest possible time.

6.2 Vinyl Chloride

After lengthy deliberation, the motion was made seconded, and passed that the phrase "Cancer-Suspect-Agent" appear in the label immediately after the leading statement "Extremely Flammable Liquid and Gas Under Pressure."

6.3 Salt as an Emetic

A thoroughgoing review was presented on the reasons why further implementation of the Occupational Health Committee decision be suspended and why recommendations concerning salt as an emetic need not be discontinued immediately.

Mr. Lore presented for the consideration of the LAPI Committee the following wording which may be used as a modification of existing documents wherein reference is made to salt as an emetic:

"The information in First Aid and/or Precautionary Labeling for using salt solution to induce vomiting is hereby modified as follows: 'Salt solution to induce vomiting should be administered only with medical approval'."

6.4 Phosgene

The label for Chemical Safety Data Sheet SD-95, Phosgene as submitted to the members of the Subcommittee is acceptable. The following observation was presented in connection with the deliberations of this Subcommittee:

The question of corrosivity of phosgene is difficult to answer quantitatively. SD-95, 4.2 notes "It is unlikely that there will be eye or skin irritation without involvement also of the lungs."

The draft label of 4/19/76 is based on the premise that corrosivity is a secondary hazard but that it is present. The instruction for skin and eye contact is given in SD-95 4.2.3 which reads "Contact of the skin or eyes with phosgene should be followed immediately with a minimum of 15 minutes washing with water."

The Inter-Governmental Maritime Consultative Organization (IMCO) also recommends that phosgene be labeled with the United Nations "Corrosive" label, in addition to the United Nations "Poison Gas" label. This document lends support to the SD-95 concern with potential skin and eye injury.

6.5 Action on Safety Data Sheet SD-57, Methylamines

The labels for both anhydrous and aqueous methylamines were approved after the acceptance of Subcommittee recommendations that the word "open" be deleted from the phrase "open flame."

The Subcommittee recommends that the first aid section of the label for aqueous methylamines be changed to read as follows:

"In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a Physician. Wash clothing before reuse."

6.6 Action on Safety Data Sheet SD-44, Chromic Acid

The Subcommittee on Chromic Acid has been expanded to include:

Dr. C. U. Dernehl	Union Carbide Corporation
Dr. Warren H. Jones	Eastman Kodak Company

Action on Chromic Acid will not be completed until the Subcommittee has had an opportunity to review in its entirety the final draft of this Safety Data Sheet.

6.7 Action on Safety Data Sheet SD-46, Sodium and Potassium Dichromates

The Subcommittee has been expanded to include:

Mr. J. J. Trexel	E. I. du Pont de Nemours
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Toxicological data secured by PPG Industries supports classification of these products as poisons via skin absorption rather than by ingestion or inhalation. The final draft of SD-46 does not reflect these findings and appropriate revision of the SD-46 text is necessary.

As soon as PPG toxicological data are made available, they will be reviewed by the Subcommittee and appropriate members of LAPIC preparatory to the drafting of a label.

6.8 Action on Safety Data Sheet SD-36, Hydrogen Sulfide

A Subcommittee on Hydrogen Sulfide has been appointed and consists of:

Mr. Orton Overman	Stauffer Chemical Company
Mr. A. G. Chasar	Mobil Oil Corporation
Dr. C. B. Shaffer	American Cyanamid Company
Mr. C. J. Stroemple	PPG Industries, Inc.
Mr. A. Thayer Talcott	Dow Chemical Company
Mr. J. V. Urenovitch	Air Products and Chemicals

7.0 Proposed Federal Standard FED-STD-Hazardous Materials:
Marking and Labeling Interior Containers of (Project
PAK 0546), Dated April 8, 1976

Mr. G. Robert Sido is to be added to the roster of the Subcommittee on this proposed standard.

After due deliberation on this subject, it was the decision of the Committee that those companies having an interest in and concern with this document would comment directly to the Naval Supply System Command (SUP 0321).

Representatives of those companies expressing an intent to file comments emphasized the potentially productive exchange which could evolve from a meeting with Cmdr. R. E. Plante. The Secretary will contact Cmdr. Plante in an effort to arrange such a meeting.

8.0 Recommendation of the LAPIC Concerning "Guide to
Precautionary Labeling of Hazardous Chemicals, Seventh
Edition, -1970"

The following unanimous decision and/or recommendation was made with respect to questions presented by MCA Management:

- 1) Orders or requests for copies of this subject document from the current printing are to be filled under the condition that,
- 2) In each copy there will be inserted (or attached thereto) a letter or notification calling attention to the availability of ANSI Standard Z129.1 and that, of the two, the Standard is the preferred document. Details are to be given in the letter as to how copies of Z129.1 may be obtained, and

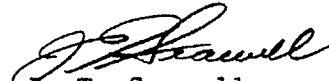
- 3) When the current supply of the 1970 edition is depleted, no more will be reprinted.

9.0 Future Meetings

The majority vote during the May 26, 1976 meeting showed that the LAPIC still prefers one-day meetings.

Plans have been made and confirmed for meetings and luncheons on the following dates.

October 27, 1976
January 6, 1977
May 5, 1977


J. T. Seawell

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Attachments

Minutes subject to approval

July 16, 1976

APPENDIX I

PROPOSED REVISIONS IN THE ANSI STANDARD Z129.1 TO ACCOMPLISH
THE NAMING OF HAZARDOUS INGREDIENTS IN A LABEL

Step 1. Change definition of "hazardous chemical"
to read as follows:

hazardous chemical. A substance falling within either of
the following categories:

(1) A chemical or mixture of chemicals that is toxic, highly toxic, irritant, corrosive, a strong oxidizer, a strong sensitizer, combustible, flammable, extremely flammable, dangerously reactive, or pressure-generating, or which otherwise may cause substantial personal injury or substantial illness during or as a direct result of any customary or reasonably foreseeable handling or use.

(2) A material consisting in whole or in part of a material that is listed in Tables G-1, G-2 or G-3 of 29 CFR 1910.93, provided that such listed material is present in such an amount that under any reasonably foreseeable conditions of use, handling, storage, processing, or disposal, an airborne concentration in excess of the exposure limits prescribed in tables G-1, G-2 or G-3 of 29 CFR 1910.93 is likely to be released.

Step 2. Change subparagraph 3.3 to read as follows:

3.3 Identification of the product shall not be limited to a nondescriptive code designation or trade name. Regardless of the use of proprietary identification, the label shall include the following:

(a) The common or usual name or the chemical name (if there be no common or usual name) of the hazardous material of each component which contributes substantially to its hazard; except that, when the sole hazard of a pressurized material is that it generates pressure, or when the sole hazard of a material is that it is flammable or combustible, the name of the material or of the component which contributes the hazard need not be stated.

(b) The name, as used in the table, of any material listed in tables G-1, G-2, or G-3 of 29 CFR 1910.93, provided that such listed material is present in such an amount that under any reasonably foreseeable conditions of use, handling, storage, processing, or disposal, an airborne concentration in excess of the exposure limits prescribed in the table is likely to be released.

Step 3. Insert a new subparagraph 3.12 in paragraph 3.

3.12 The label shall include the signal word WARNING!, the statement of hazard HARMFUL IF INHALED, and the precautionary measure "Avoid breathing (dust, fume, gas, mist, vapor)"¹ for a material which hazardous as defined in subparagraph....., and which is not highly toxic by inhalation or toxic by inhalation.

¹Select the applicable word or words in parentheses.

Prepared by C. B. Shaffer
LAPI Committee Meeting
May 26, 1976

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COMPRESSED GAS ASSOCIATION, INC.
500 FIFTH AVENUE • NEW YORK, N.Y. 10036 • (212) 354-1130

June 4, 1976

Dr. Warren H. Jones
Eastman Kodak Company
1669 Lake Ave.
Rochester, N.Y. 14650

SUBJECT: PRECAUTIONARY LABELING OF COMPRESSED
GAS CONTAINERS
CGA DOCKET C-7 - 1971

Dear Dr. Jones:

Please excuse my long delay in answering your letter of March 30, 1976, dealing with ANSI Standard Z129.1 and CGA plans for developing precautionary labeling for compressed gas containers. I know that our telephone conversation prior to the MCA LAPI Committee meeting on May 26th served to answer your questions orally, and now I am in a position to confirm those answers in writing.

We now have a reorganized task force made up of member company representatives charged with developing a revised and substantially expanded version of our present CGA Pamphlet C-7 entitled, "Guide to the Precautionary Labeling of Compressed Gas Containers". The task force held its first meeting here on April 30th, primarily to get organized on what will be a fairly substantial task. In the case of compressed gases, it appears as though we will probably go the individual product route as far as precautionary labeling text is concerned, at least for the more commonly used gases and mixtures. We have three broad product areas to cover, industrial, medical and specialty gases. In some of the mixture areas, we may go the generic route that MCA has tended to follow in the LAPI manual that is now ANSI Z129.1.

As you probably know, we have done a good deal of work in developing standard cylinder valve outlet configurations assigned to different gases, and have a proposed revision of ANSI B57.1 out for consideration, at the present time. It is expected that revised Pamphlet C-7 will cover as a very minimum all of the gases that are listed in the valve standardization pamphlet.

Dr. Warren H. Jones

-2-

June 4, 1976

Several years back, there was reluctance on the part of some gas producing companies to consider the use of standardized precautionary labeling either in total or as a minimum. We think this attitude has changed because of developments in the last year or so, but to be on the safe side we have written the top managements of most of the gas companies in the country asking them a specific question as to whether or not they would use standardized precautionary language if it was developed. We also pointed out that as far as medical gases are concerned, in all probability there will be an FDA regulatory requirement to use certain standardized language. Our response to this letter is not yet complete, but the responses received to date urge us to develop such language and clearly indicate that it would be used if available.

The specialty gas part of the industry has been actively working on this project for well over a year, and they now are in a position to be close to agreement on many of the specialty gas products that will carry precautionary labeling information.

The medical gas group has also been working actively, but they are somewhat curtailed because of lack of response to date from the FDA. However, it now appears as though the FDA is going to issue good manufacturing practices for medical gases as an individual product line, and this proposed gmp will undoubtedly include references to labeling.

It is the industrial gas group that is really the laggard in the total area, and by means of this newly reorganized task force we are hoping to spur them into some real constructive activity starting as of now.

We hope this brings you up to date as to our activity and we will certainly continue to keep you informed regarding progress in developing a revision of C-7. When we get a proposed draft together we will see that copies are sent to the MCA LAPI Committee so that we can solicit your comments and suggestions.

Once the project is complete, it is our intent to submit it to ANSI for consideration as a standard either as a part of Z129.1 or as a companion piece to it.

Sincerely yours,

Robert E. Lenhard
Managing Director

/mf

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