

Monsanto

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February 7, 1972

Mr. George E. Best
Secretary
Board Liaison Committee
for Environmental
Quality and Control
Manufacturing Chemists Association

Dear Mr. Best:

PROGRESS OF LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

Labeling Regulations - OSHA

The Department of Labor has not published labeling requirements. The act requires the Secretary to issue regulations before April 13, 1973 and to use a National Consensus Standard or a Federal Standard, unless he determines such a standard would not result in improved safety and health for specifically designated employees. Federal Standard 313 is new and the only qualified labeling standard. It endorses MCA Manual L-1 Hazard and Safeguard Text on Packages, but adds use of NFPA's controversial numerical health, fire and reactivity rating symbol. LAPIC wants to establish a more acceptable option than NFPA 704M for OSHA regulation.

LAPIC is dedicated to establishment of one coordinated labeling program which provides for unrestricted distribution of industrial chemicals. International pictorial hazard symbols, MCA's Transportation Emergency Guide numbers and DOT's emerging Hazard Information numerical guides and pictorial hazard symbols are also competing and complicating labeling.

Alternate to Federal Standard 313

To provide a more acceptable labeling standard we have tried but failed to establish the MCA Manual L-1 "Guide to Precautionary Labeling of Hazardous Chemicals" as an ANSI standard by canvass vote of interested and affected organizations. Insurance and Fire Protection groups oppose on

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Report of
Activities of Occupational Health Committee
Manufacturing Chemists Association

N. V. Hendricks, Chairman

Government Liaison

Contacts have been developed with OSHA program personnel. Representatives from the National Institute of Occupational Safety and Health have approached us to discuss information on the more important industrial chemicals in terms of production, use, toxicity and extent of potential exposure. This group is responsible for surveillance of occupational hazards, control measures, occupational illnesses and the statistical analysis of these factors. Arrangements will be made for them to discuss their interest at the next meeting of the Occupational Health Committee.

New Orleans Workshop

The committee cooperated with the Safety and Fire Protection Committee in a Workshop held in September where the subject material dealt with the impact of the Occupational Safety and Health Act on the chemical industry. The Workshop was highly successful with over 400 in attendance and a higher degree of interest and participation.

Polyvinyl Chloride Program

As a second phase of the Acroosteolysis study in the PVC industry, a follow up program has been established at the University of Michigan. Participating companies will provide information to be used in the evaluation of the course of these diseases, especially trends after cessation of exposure. This program is being continued and the University of Michigan feels it is beginning to provide valuable information.

Vinyl Chloride Studies

With a background of studies done in Italy where animals exposed to vinyl chloride developed a high incidence of both skin and lung cancer, discussions have been held with the Italian investigators. Details of these studies which have been published were presented to the industry group in November along with recommendations from the Occupational Health Committee for studies of this problem.

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SAFETY AND FIRE PROTECTION COMMITTEE REPORT OF ACTIVITIES

BOARD LIAISON COMMITTEE - 2/8/72

Following is a brief summary of some of the major activities of our Committee since our last meeting. We have had two meetings with the technical staff of the Department of Labor for the purpose of reviewing changes made to consensus standards that are neither feasible nor sound from a Loss Prevention standpoint, accompanied by recommendations to change the standards back to their original intent. These meetings were coordinated with other MCA committees for their input and included representation from the Occupational Health and Labels Committees. A summarization of the agreements reached at these meetings was circulated to all interested MCA committees.

At a meeting with the Department of Labor, we also discussed the possibility of MCA issuing, for the Industry, stereo-type Material Safety Data Sheets and have not pursued this matter any further than our original exploratory meeting with the Department of Labor. There apparently is still a conflict between the Department of Labor and other governmental agencies concerning the content of those forms. In addition, it appears that due to these conflicts, this will not become a requirement under the law until at least 1973. We have just recently persuaded Mr. Driver to circulate letters to all executive contacts advising them of the status of the Material Safety Data Sheets and a second letter to Mr. Guenther, Assistant Secretary of Labor, to publicize the fact that this is still not required by law and to advise as to the status and timetable for publication in the Federal Register.

A task force has now been formed in our Committee with a rather ambitious undertaking to totally review all of the standards that exist as well as the ones that will be published in the near future by the Department of Labor for the purpose of reviewing any and all changes made by the Department of Labor to consensus standards and to submit to the Department of Labor with MCA endorsement, recommendations and language to either clarify or change the standards back to original context. Our Committee agreed that where existing consensus standards appear to be impractical or incorrect, that we would submit those requests for changes back to the consensus-making body. It is my understanding that just recently an inter-committee task force has been formed with Mr. Stephenson acting as Secretary so that all interested committees can provide input to evaluations of all OSHA standards. It is vitally important that the mechanics

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Report of
SOLID WASTE MANAGEMENT COMMITTEE
to the
MCA BOARD LIAISON COMMITTEE FOR ENVIRONMENTAL QUALITY

The SWMC has been most active in developing guidelines and recommended practices for disposing of solid wastes of the chemical industry. Significant developments are in the following areas.

1. Landfill

The first draft of initiating and maintaining a chemical landfill has been produced. Expertise from member firms and the EPA Office of Solid Waste Management Programs is being blended into guidelines for proper operation of landfills.

Parallel to this endeavor is a continuing survey of state regulations relating to solid waste disposal, particularly by landfill. Each committee member is assigned to follow appropriate legislation in 2 states and report to the secretary. States with particularly comprehensive regulations will be discussed as possible model regulations for other states.

2. Disposal by private contractors

Guidelines are being developed in conjunction with the National Solid Waste Management Association (a trade organization similar to MCA). Exploratory meetings are being set up between MCA-SWMC members and the association to discuss needs, capabilities and requirements. It is envisioned that this would lead to mutually conducted workshops to study most effective technologies, particularly related to landfill.

3. Industrial pollution ratings

A special 3-man committee has been appointed to wrestle with this problem as it relates to solid wastes handling. A rather extensive discussion by the entire committee indicated that while they agree that such a rating system may be desirable, the chances of agreeing upon one are remote. However, three criteria were discussed that may be developed further, namely,

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February 1, 1972

REPORT OF THE WATER RESOURCES COMMITTEE OF
THE MANUFACTURING CHEMISTS ASSOC.

Presented to the Manufacturing Chemists Association Board
Liaison Committee for Environmental Quality and Control at
Meeting of February 8, 1972.

During the period since the last report was made to you (November 24, 1971) the Water Resources Committee held their winter meeting at Dallas, Texas on January 18-19, 1972. Mr. Arthur Busch, newly installed administrator of the Dallas Regional Office of EPA was a luncheon guest and speaker on January 18, and Mr. Hugh C. Yantis, Executive Director of the Texas Water Quality Board was luncheon guest and speaker on January 19. Some of the items of most import, discussed at Dallas WRC meeting, are summarized below:

- Research Budget - The committee voted to request research funds in the amount of \$45,000 for FY72-73. A maximum of \$15,000 of these funds would be used to conclude the fish avoidance studies conducted by Ichthyological Associates and for preparation of a plant operator's manual detailing the necessary equipment and techniques to perform the avoidance tests. The remainder of the \$45,000 would be utilized by Dr. John Cairns of Virginia Polytechnic Institute and State University to continue his research in simplified biological monitoring techniques.
- Environmental Rating Index - This matter referred to the WRC by Mr. Gerstacker was discussed and an ad hoc committee appointed by Chairman Byrd to consider the opinions voiced and to prepare a recommendation. The majority of the opinion expressed was pessimistic in regard to devising a meaningful index.

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