

MANUFACTURING CHEMISTS' ASSOCIATION, INC.
MINUTES OF MEETING
LABELS AND PRECAUTIONARY INFORMATION COMMITTEE
Hotel New Yorker, New York, N.Y., September 18-19, 1951

L-1

Chairman Low called the meeting to order at 9:30 A.M. The following members and guests were present:

Messrs. F. S. Low, Chairman	R. D. Minter
T. R. Aalto	F. D. Sparre (for S. J. Hill)
F. Bartenstein	W. W. Sunderland
A. G. Cranch	J. S. Walker
J. H. Foulger	N. M. Walker
J. T. Fuess	J. B. Williamson
W. A. Knapp	D. E. Campbell, Secretary
M. D. Madsen (for A. Q. Butler)	

Guests: N. V. Hendricks, Standard Oil Development Co. (Tues. and Wed. mornings only)

Ralph Troup, J. T. Baker Chemical Company

1. ELECTION OF OFFICERS AND NEW MEMBERS

1.1 Officers It was moved and seconded that the present officers of the Committee be continued in office for another term of one year in accordance with the provisions of the Committee as recorded in the minutes of the meeting held February 8-9, 1949. The motion passed unanimously. Officers for the coming year will then be Chairman Frank S. Low and Vice Chairman John Williamson.

1.2 Membership Mr. N. M. Walker was elected to membership on the Committee by motion seconded and voted. Mr. Walker, representative of the Pennsylvania Salt Manufacturing Company, will fill the vacancy caused by the resignation of Mr. Benbury.

2. REGULATIONS (Federal, State or Municipal Laws, Regulations, Ordinances or Codes Affecting Labeling, Safe Handling, or Storage, etc.)

2.1 State Regulations

2.11 California

Mr. Sparre reported on the meeting of Mr. Hill and Mr. Sherman in California. It was indicated that the California Department of Industrial Relations, Division of Industrial Safety, will revise its "General Industry Safety Orders, Labeling of Injurious Substances," in the near future. That body has indicated that no date has been set for this revision but that the MCA will be notified in order to participate in Committee meetings and public hearings. It is suggested that the Committee make a representation that the California Labels be brought into conformity with the principles of Manual L-1. It was indicated that there might be some difficulty in

obtaining complete acceptance on the part of some of the Members of the Board in California. Mr. Sherman will be kept advised of all changes in labels accepted by this Committee.

2.12 Massachusetts

Mr. Fuess reported on Massachusetts Bills, House 2402 and Senate 309, introduced in the 1951 session of the Massachusetts Legislature. Senate Bill 309 passed both houses of the Legislature but when referred to the Ways and Means Committee was stopped because of action of that Committee. It was indicated that although this Bill, providing for a Board for the "regulation of toxic substances," had not been affected at this session, further attempts would be made in the future. In view of this situation, every effort will be made to follow developments in Massachusetts and to encourage the enactment of regulations in conformity with a standard pattern, utilizing the principles in Manual L-1. It is hoped that such action might be instrumental in revising the present regulatory provisions of Massachusetts which are not in complete uniformity with other state bodies. Mr. Minter will follow the progress of this matter in connection with Massachusetts contacts. Mr. Low was authorized to establish contact and to initiate the aid of the Interstate Committee for Uniform Legislation.

2.13 Virginia

The questionnaire circulated by Mr. Berry, Chairman of the Virginia Legislative Committee, was discussed. It was indicated that members of the Committee attending the annual meeting of the A.E.P.C.O. in October will represent this Committee at that discussion. Every effort shall be made to continue LAPI principles and to retain contact, if not a measure of control, in the development of new labels in this field.

2.14 Illinois

Copies of Part "J", Rules and Regulations of the Illinois Industrial Commission were circulated to the members. It was moved, seconded and passed that the Committee express their thanks to Mr. Minter for his very diligent and intelligent work resulting in the adoption of these Rules and Regulations.

Referring to the question of a color code which has been suggested by groups in Illinois, this matter is tentative and would require new hearings before it could be adopted.

It was indicated that the regulations specifying closed cup testing were the result of a compromise in the development of the regulations. It was noted that the city and State regulations are set on a closed cup basis.

2.15 Ohio

Mr. Minter reported the meeting he and Mr. Grass had with Dr. Mancuso in Ohio. Dr. Mancuso had indicated at this March 27, 1951, meeting that he would present the LAPI principles to the Association of State and Territorial Health Officers when it meets during December of this year. Dr. Mancuso has indicated complete cooperation and sympathy with our principles and will make every effort to facilitate their adoption in Ohio. At the present, however, there is opposition from manufacturers groups within the State.

2.2 City Regulations

2.21 New York City

Mr. Fuess presented his letter of September 14, 1951, directed to Mr. Mayhood, with attached suggestions for revision of the New York City regulations. This provided for minor changes in the new regulations as suggested by the joint committee of MCA Chemical Specialties Manufacturers Association and the Drug, Chemical and Allied Trades Group. The revisions include a Table II, providing a minimum type size for an indicated size of container. The completed form of this Table will be circulated to members of the LAPI Committee. It was moved, seconded and voted that the draft as revised by Mr. Fuess and his Committee and included with his letter of September 14, will be used and approved for submission to the joint group.

3. LABELS - SAFETY DATA SHEETS

- 3.1 Sodium The following label, reported by Mr. Sparre in behalf of Mr. Hill, was approved with the conditions as stated:

SODIUM

**DANGER! REACTS VIOLENTLY WITH WATER LIBERATING
AND IGNITING HYDROGEN
MAY CAUSE BURNS**

Keep from any possible contact with water.

Keep container tightly closed.

Do not get in eyes or on skin.

Wear goggles and DRY gloves when handling.

In case of fire, smother with DRY SODA ASH - NEVER USE WATER
OR CHEMICAL FIRE EXTINGUISHERS.

Dispose of SODIUM by burning carefully in an open fire.

FIRST AID TREATMENT

(See page L-4)

CALL A PHYSICIAN IMMEDIATELY.

SKIN: Remove SODIUM and flush affected area with water.

EYES: (See note below)

It was moved, seconded and voted by the Committee that the statement of first aid treatment for the eyes in the SODIUM label be left to the discretion of the Medical Advisory Committee.

3.2 Lead Dioxide

LEAD DIOXIDE

WARNING! HARMFUL DUST

Avoid breathing dust. Wear respirator approved by U. S. Bureau of Mines for ~~damaging~~ toxic dusts.

Wash thoroughly before eating or smoking.

Keep away from feed or food products.

Keep container closed and away from combustible material.

This label was accepted by the Committee as stated above. A copy of a letter dated September 11, 1951, from Mr. Pearce, the U. S. Bureau of Mines, is attached (Appendix A) to these minutes in reference to this label.

3.3 Acetic Acid and Related Compounds

3.31 Acetic Acid

The labels for acetic acid as presently shown in Manual L-1, pp.21 and 22, were accepted by the Committee with no changes.

3.32 Acetaldehyde

ACETALDEHYDE

DANGER! EXTREMELY FLAMMABLE

May Form Explosive Peroxides under Air Pressure

Keep away from heat, sparks, and open flame.

Keep container closed.

Use with adequate ventilation.

Avoid prolonged breathing of vapor.

Cool to below 68° F before opening.

Do not use air pressure to transfer.

This label as presented was adopted by the Committee and approved for inclusion in the Safety Data Sheet.

3.4 Chromium Chemicals

3.41 Chromic Acid

CHROMIC ACID

DANGER! CONTACT WITH COMBUSTIBLE MATERIAL MAY
CAUSE FIRE
MAY CAUSE BURNS OR EXTERNAL ULCERS

Keep container closed.
Avoid contact with skin and eyes.
Avoid breathing dust or mist from solutions.
In case of contact, immediately flush skin or eyes with plenty of
water for at least 15 minutes; for eyes, get medical attention.
Wash clothing before re-use.
Use fresh clothing daily. Take hot shower after work using plenty
of soap.

The label as presented was adopted for inclusion in the Safety Data Sheet.

3.42 Ammonium Dichromate

The label was approved as presently found on p.24 of Manual L-1.

3.43 Sodium Dichromate and Potassium Dichromate

The form of label was approved as now found on p.59 of Manual L-1 for
Sodium Dichromate.

3.5 Sodium Chlorate The label was approved as found on p.59 of
Manual L-1.

3.6 Toluene, cresol Consideration of these labels was continued on the
Agenda for the next meeting.

3.7 Bromine

BROMINE

L-6

**DANGER! CAUSES SEVERE BURNS
VAPOR HAZARDOUS**

Do not get in eyes, on skin, on clothing.

Do not breathe vapor.

Wear goggles, Neoprene rubber gloves, and rubber protective clothing when handling.

In case of contact, immediately remove all contaminated clothing including shoes, and flush skin with plenty of water for at least 15 minutes. Flush eyes for at least 30 minutes. Get medical attention in all cases.

Wash clothing before reuse.

If inhaled, remove patient to fresh air, keep him warm and quiet until physician arrives.

4. NEW LABELS

4.1 Parathion The Committee formally adopted the text of the parathion labels which were discussed at the last meeting of the Committee and which have been subsequently approved by the Department of Agriculture. The text of these labels is included as Appendix B with these Minutes.

4.2 Heptanol and Hexanol After discussion of the labeling of heptanol and hexanol, it was the Committee's opinion that there is no reason for labeling of heptanol. Manual L-1 indicates that the labeling would be the same as used for iso-Amyl Acetate. In the next revision of Manual L-1, heptanol and hexanol will be deleted.

5. REVISION OF MANUAL L-1 In response to various suggestions, the Committee in charge of revision of Manual L-1 will be reactivated with a view to issuance of a new edition in 1952. All members of the Committee are requested to send suggestions for changes in principles, labels, etc., to Chairman Knapp as soon as possible.

6. COLLABORATION WITH ACS COMMITTEE ON LABELS Mr. Low reported that no contact has been established with the ACS in addition to that listed in previous minutes. It is expected that a conference can be arranged in the near future to be reported at the next meeting.

7. CARBONA PRODUCTS - LABELING Correspondence from the Carbona Company relative to labeling problems with California and Massachusetts was discussed. This Company has indicated that they will comply with the regulations of these two States and that possibly their label for general use may be improved to bring it into conformity with LAPI principles.

8. DEPARTMENT OF LABOR - SAFETY COURSE The Secretary reported that the labels submitted by members of the Committee had been transmitted to the Department of Labor. Efforts will be continued to follow the development of this course in an effort to further LAPI principles especially before the various state regulatory and labor officials for whom this course is designed.

9. COMBUSTIBLE OR FLAMMABLE SOLIDS After considerable discussion on the part of the Committee, it was voted not to include this classification in the new manual and it was ordered dropped from the agenda. This item should not be confused with the subject of definition for combustible liquids which was also discussed under another heading.

9.1 Combustible Liquid The Committee discussed this item with particular reference to a letter of May 7, 1951, from Mr. Williamson, which suggested that this definition be removed from the list for possible inclusion in future publications of the Committee. It was moved, seconded and voted that the matter of this definition of combustible liquid be continued for discussion and study and any action on inclusion of the definition in the Manual be held in abeyance, pending report of the subcommittee. The subcommittee was appointed, consisting of F. S. Low, Chairman, with J. B. Williamson and J. T. Fuess. Members of the Committee are asked to consider their own situations and report to this subcommittee. Dr. Cranch was asked to put before the Safety Committee the question of whether there is or is not a substantial hazard from this class of compound.

10. REINHOLD DICTIONARY Mr. J. S. Walker reported that this subject is being handled by himself and the Washington office and that the Reinhold Publishing Company will be notified of the errors which it is hoped will be corrected in later editions.

11. SURGEON GENERAL'S AGREEMENTS Dr. Cranch reported on this item, reviewing the history and development of the agreements. At a recent meeting of Dr. Cranch and Dr. Neal of the National Institute of Public Health, it was decided that there was not sufficient need at present for a reactivation of this committee. The need for these agreements has decreased and is being handled largely by other means of control. In view of the developments and the fact that several new manufacturers have appeared in the field who are not parties to the agreement, it was recommended that Dr. Cranch write the Public Health Service, calling attention to these facts and requesting that they consider abrogation of the agreements.

12. LABELING OF SMALL PACKAGES AND HOUSEHOLD PRODUCTS

12.1 Subcommittee As a result of discussions by the Committee, it was decided to form a special subcommittee to study the general problem of small package labeling, including economic poisons for household use.

This subcommittee is to contact other groups in the field as well as prepare a report with recommendations for action by this Committee. This latter report will be prepared as promptly as possible for circulation to the members. This subcommittee consists of Sanford Hill, Chairman, with Fuess, Butler, Knapp and Troup.

12.2 CSMA Proposal The Committee was informed of tentative proposals for CSMA to consider and prepare labels for economic poisons. This item will be considered by the Subcommittee on the Labeling of Small Packages as indicated above.

13. LIST OF WARNING TEXTS It was agreed that a list should be prepared containing the texts of labels adopted by the Committee since the publication of Manual L-1. The Secretary will attempt to compile this list from the minutes of previous meetings and will circulate copies to members of the Committee as well as various Trade Journals for notice and publication.

The Committee has indicated interest in the preparation of an index of the minutes of the meetings of this Committee and Mr. Minter has volunteered to progress this item.

14. TOXICOLOGICAL CLEARING HOUSE The proposal of the U.S.P.H.S. Cincinnati laboratory to function as a clearing house for filing and distributing all toxicological data was discussed and a decision was reached not to participate in this proposal except to the extent of making available to them the text of any publications on the part of our MCA members having to do with toxicological information.

15. REASONS FOR LABEL STATEMENTS Mr. Williamson brought to the attention of the Committee the fact that in many cases the label text adopted and appearing in Manual L-1, represented a consensus of experience on the part of the manufacturers of the labeled products together with comments of the members of this Committee. Such information would often be of considerable interest and value to members in working with the labels. In order to provide as complete a record as possible, the Committee adopted the following proposal. It was moved, seconded and voted that the Chairman of the Subcommittee charged with the preparation of any label text will prepare a report and brief record of the basic points leading to the adoption of each statement in the final label, which will be submitted to the Washington office following the adoption of the label.

16. NEXT MEETING The next meeting of the Committee will be held February 5 and 6, 1952, Shoreham Hotel, Washington, D.C. Members may make room reservations at any time, directly with the Hotel, referring to this meeting of the Committee, to the attention of Mr. Moore, General Manager.

Minutes subject to approval.

Douglas E. Campbell
Secretary

APPENDIX A - LEAD DIOXIDE - SEE SECTION 3.2

UNITED STATES
DEPARTMENT OF THE INTERIOR

Bureau of Mines
4800 Forbes Street
Pittsburgh 13, Pennsylvania

September 11, 1951

Through: L. B. Berger
/s/ L.B.B.

Mr. M. D. Madsen
Mallinckrodt Chemical Works
Second and Mallinckrodt Streets
St. Louis 7, Missouri

Dear Mr. Madsen:

Your letter to Dr. H. H. Schrenk dated September 5, 1951, regarding statements on M.C.A. warning labels concerning respiratory protection against lead dioxide has been referred to me for consideration and reply.

During the period from 1935 to 1939, the Bureau of Mines granted approvals on several respirators to cover respiratory protection against lead dusts. In October 1939, these approvals were broadened to cover respiratory protection against toxic dusts. In February 1951, these approvals were limited to dusts that are not significantly more toxic than lead. The reason for this last change was that in the past few years several highly toxic dusts and fumes have become fairly common, namely, beryllium dusts and fumes, dusts impregnated with organic phosphorous compounds such as some recently-developed insecticides, and radio-active dusts. The Bureau of Mines does not feel that toxic dust respirators, as approved under the existing Schedule 21, offer adequate respiratory protection against these hazards, hence the limitation.

There are at present dispersoid respirators that have been approved for respiratory protection against the following classes of particulate matter: (1) Pneumoconiosis-producing and nuisance dusts; (2) pneumoconiosis-producing dusts and mists and chromic acid mist; (3) toxic dusts; (4) dusts-a combination of (1) and (3); (5) dusts, pneumoconiosis-producing mists and chromic acid mists; (6) fumes; and (7) dusts, fumes, pneumoconiosis-producing and chromic acid mists. Thus, there are four classes of respirators, (3), (4), (5) and (7), that afford adequate respiratory protection against toxic dusts that are not significantly more toxic than lead.

On the basis of the preceding information, I would suggest that the statement for the warning labels for lead dioxide, lead acetate, or litharge should read as follows: "Wear respirator approved by U. S. Bureau of Mines

for dusts or toxic dusts." This would not rule out the use of respirators in addition to those marked specifically, "Toxic Dusts."

Incidentally, Dr. Schrenk is no longer with the Bureau of Mines. His present address is: Industrial Hygiene Foundation, 4400 Fifth Avenue, Pittsburgh 13, Pennsylvania. Inquiries regarding the work of the Health Branch of the Bureau of Mines should be addressed to Mr. L. B. Berger, Acting Chief, Health Branch, Bureau of Mines, 4800 Forbes Street, Pittsburgh 13, Pennsylvania.

Sincerely yours,

/s/
S. J. Pearce, Chemist in Charge
Respirator Section, Health Branch

APPENDIX B - PARATHION LABELS - SEE SECTION 4.1

PARATHION FIRST AID

☛ P O I S O N ☛

ATROPINE IS AN ANTIDOTE -- CONSULT PHYSICIAN FOR EMERGENCY SUPPLY

FIRST AID TREATMENT

CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED PARATHION POISONING.

If symptoms or signs of poisoning include blurred vision, abdominal cramps and tightness in the chest, don't wait for a doctor but give two atropine tablets (each 1/100 gr.) at once.

Remove patient immediately from the area where parathion is present.

Remove contaminated clothing and wash the skin clean with plenty of soap and water to remove all traces of parathion. If swallowed, induce vomiting by giving warm salty or soapy water.

NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON

PHYSICIANS' NOTE: Warning symptoms include weakness, headache, tightness in the chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps.

TREATMENT: Give atropine, preferably by injection, grains 1/100 two or three tablets at once and parenterally or orally every hour as required up to 30 tablets or until pupils dilate. Never give morphine. Clear chest by postural drainage. Artificial respiration or oxygen administration may be necessary. Observe patient continuously 48 hours. Repeated exposure to cholinesterase inhibitors may, without warning, cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until time for cholinesterase regeneration has been allowed as determined by blood tests.

PARATHION

1. (For Parathion Technical)

Before using consult manufacturer for safe handling instructions.

DANGER!

Poisonous By Skin Contact, Inhalation, or Swallowing.

Rapidly Absorbed Through Skin.

Repeated Exposure May, Without Symptoms, Be Increasingly Hazardous.

Do not get on skin, in eyes, on clothing.

Wear clean heavy rubber gloves and clean waterproof or freshly laundered protective clothing (coveralls, rubber boots, cap, etc.). Destroy and replace gloves frequently.

Bathe immediately after work and change all clothing. Wash clothing thoroughly with soap and hot water before re-use.

In case of contact immediately remove contaminated clothing and wash skin thoroughly with soap and water; for eyes flush with water for 15 minutes.

Do not breathe vapor or dust.

Wear respirator or mask effective for parathion protection.

In case of spillage cover with an absorbent such as soda ash, lime, clay or sawdust. Sweep up and bury. Wash area thoroughly with strong lye solution.

● POISON ●

First Aid Treatment

PARATHION

2. (For Parathion Wettable Powders & Dusts (25% or less concentrations)).

DANGER!

Poisonous By Skin Contact, Inhalation, Or Swallowing.
Rapidly Absorbed Through Skin.
Repeated Exposure May, Without Symptoms, Be Increasingly Hazardous.

Do not get on skin, on clothing.

Wear clean heavy rubber gloves and clean water-proof or freshly laundered protective clothing (coveralls, cap, etc.). Destroy and replace gloves frequently.

Wash thoroughly with soap and warm water before eating or smoking.

Bathe immediately after work and change all clothing. Wash clothing thoroughly with soap and hot water before re-use.

In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water.

Do not breathe dust, vapor or spray mist.

Wear respirator of a type passed by the U. S. Department of Agriculture for parathion protection. Airplane pilots should wear full-face canister-type mask.

If handled indoors provide mechanical exhaust ventilation.

Do not store near food or feed products.

Bury spillage; clean up area with strong lye solution. Burn or bury containers; never re-use.

POISON

First Aid Treatment

(Note: Labels should bear a statement relative to the protection of persons and animals in treated and adjacent areas.)