



MANUFACTURING CHEMISTS ASSOCIATION

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440.

MINUTES OF MEETING
SAFETY AND FIRE PROTECTION COMMITTEE
Washington, D. C. December 14, 1971

PRESENT

Sanford Schreiber, Chairman
John Jorgensen, Vice Chairman
C. H. Barboni
J. C. Breckenridge (for J. S. Queener)
A. H. Christian
D. L. Dowell
J. E. Gillan
G. L. Gorbelle
G. A. Jamieson
H. J. Kolodner
F. O. Kubias
S. M. MacCutcheon
J. S. Snyder
E. C. Sommer
S. F. Spence
J. J. Walker
W. S. Wood
F. G. Stephenson, Secretary

Allied Chemical Corporation
Rohm and Haas Company
CIBA-GEIGY Corporation
E. I. du Pont de Nemours & Company
FMC Corporation
B. F. Goodrich Chemical Company
Atlas Chemical Industries, Inc.
Monsanto Company
Canadian Industries Limited
Celanese Corporation
Mallinckrodt Chemical Works
The Dow Chemical Company
Merck & Co., Inc.
Esso Research & Engineering Company
American Cyanamid Company
Union Carbide Corporation
Sun Oil Company
Manufacturing Chemists Association

GUESTS

E. E. Christofano (representing
Occupational Health Committee)
C. Dickson
R. E. McIlroy
J. M. Pardee
G. L. Pillori
M. E. Woodworth

Hercules Incorporated
Fisher Scientific Company
J. T. Baker Chemical Company
Eastman Kodak Company
Fisher Scientific Company
National Fire Protection Association

1. Minutes of the September 22, 1971 meeting were approved as distributed.

2. Industrial Injury Statistics

The first of the quarterly industrial injury reports has been distributed.

Although injury reporting based on the new OSHA standard is now required under the Occupational Safety and Health Act, it was agreed to continue the MCA quarterly report based on 216.1-1967 during 1972.

CMA 040100

3. Accident Case Histories

Although some improvement is evidenced in company reporting of accident case histories for inclusion in the monthly report, the Chairman urged all committee members to ensure participation by their respective companies in this activity.

4. Safety Publications

Copies of a newly reprinted edition of SD-8 were distributed in order that committee members could become familiar with the CHEMTREC announcement now being included in Chemical Safety Data Sheets.

I. Chemical Safety Data Sheets

(a) Published since last meeting

SD-97 Diethylamine

(b) In printing stage

SD-27 Phosphorus Trichloride (revised)

(c) Drafts circulated for review

SD-98 Allyl Chloride
SD-99 Isopropyl Alcohol
SD-56 Vinyl Chloride
SD-51 Ethyl Acetate

(d) In preparation

SD-55 Butadiene - technical sections on hand
SD-16 Phosphorus Elemental - technical sections on hand
SD-28 Phosphoric Anhydride (G. L. Gorbett)
SD-43 Acetaldehyde (J. M. Pardee)
SD-57 Methylamines (J. J. Walker)
SD-6 Paraformaldehyde (H. J. Kolodner)
SD-41 Acetic Acid (J. M. Pardee)
SD-59 Propylene (J. J. Walker)
Ethylene (J. J. Walker)
Ethyl Alcohol
Xylene (W. S. Wood)

The Secretary advised that it had not been possible to publish SD-98, Allyl Chloride and SD-56, Vinyl Chloride because of delay in the preparation of precautionary labels for these materials.

It was unanimously agreed that in such cases the Secretary should proceed with publication of the Chemical Safety Data Sheet, omitting a label but including a general statement that a precautionary label based on Manual L-1, "Guide to the Precautionary Labeling of Hazardous Chemicals" should be prepared and used.

II. Standard Sections on Static Electricity

The Chairman discussed comments which have been received on the draft for the revised standard sections prepared by Mr. E. C. Sommer. There is also need for revision of NFPA #77. Mr. Sommer pointed out that bonding and grounding is too widely required in MCA data sheets and that this could lead to unduly restrictive regulation. The import of resistivity was discussed.

It was agreed that a second draft should be prepared and members given further opportunity to submit constructive comments.

III. Revised Edition of "Guide for Safety in the Chemical Laboratory"

Irritation was expressed by some members because the galley proof for the revised edition has not yet been received from the Van Nostrand Reinhold Company. The Secretary was requested to write to the company to determine the status of the project since publication early in 1972 has been planned.

IV. OSHA Material Safety Data Sheets

The committee discussed the October 9 recommendation of the inter-committee task group that MCA should proceed with preparation of standard MSDS's for the 97 chemicals for which we now have chemical safety data sheets.

It was revealed that a number of companies are actively engaged in the preparation of MSDS's for their respective products and that although publication of 97 standard MSDS's by MCA would be of some value in that it would avoid the variations which separate company preparation of the sheets would create, yet it would be but a "drop in the bucket" since the bigger companies deal with thousands of chemicals.

It was also pointed out that because MSDS's are not currently required under the Occupational Safety and Health Act, and because NIOSH is reportedly reviewing the basic form, it would not be good policy to "jump the gun" and prepare MSDS's before the proposed regulation is published for public comment.

It was therefore agreed to postpone any activity by MCA in the preparation of standard material safety data sheets.

5. Occupational Safety and Health Act

(a) Mr. G. L. Gorbell reported on his participation in the panel session on the Occupational Safety and Health Act at the MCA Semi-annual meeting in New York on November 23.

OSHA has published a Compliance Operations Manual. The Secretary was asked to obtain copies for distribution to committee members.

(b) Chairman S. Schreiber discussed matters to be raised at the meetings to be held on December 15 with representatives of OSHA. There would be two meetings -- the first, attended by a single representative from the S&FPC (Mr. Schreiber), the OHC (Mr. E. E. Christofano, and LAPI (Mr. R. F. Philpitt) would be concerned with possible revisions of the OSHA material safety data sheet form. The second meeting to be attended by Messrs. Schreiber, Gorbell, MacCutcheon, Dowell, Pardee and Kubias would be concerned with possible amendment of regulation 1910.106 dealing with containers for certain flammable and

combustible liquids, and with review of a series of questions concerning other OSHA regulations.

Reports on these meetings will be made to all committee members.

(c) Proposed OSHA Form 103 - Occupational Injuries and Illnesses Survey

Mr. A. H. Christian agreed to represent the committee at a meeting to be held on December 17 by the Business Advisory Council on Federal Reports to discuss the proposed form 103.

Concern was expressed because of the multiplicity of reports now being required.

6. Budget for 1972-73

It was agreed to recommend budgeting for 1972-73 similar to that authorized for 1971-72 but to request re-instatement of an item for research on fire protective coating of external steel structures. The chairman agreed to discuss specifics of this request with the secretary.

7. Letter Ballot to Change NFPA #704 from a Guide to a Standard

The committee discussed use of NFPA 704 and generally indicated preference for its voluntary in-house use as a guide for indicating hazard areas. It is not practicable to use it in areas where there are frequent changes in the chemicals used.

Concern by transportation departments that the 704 system might be adopted for transportation placarding was brought to the attention of the committee.

It was unanimously agreed that because of lack of specific indication as to the areas of use of NFPA 704 should it become a standard, MCA should vote negatively on the ballot.

8. MCA ad hoc Committee on Chemical Regulations

(a) Mr. H. J. Kolodner reported on MCA testimony on the bill.

(b) Bomb Scares

Copies of the forms designed to release the military from liability when disposing of bombs found on company premises were distributed. The problem of obtaining an official company signature in an emergency was discussed.

(c) Research on Dispersal of Flammable Vapor Clouds by Use of Water Spray

This research, sponsored by a group of private companies and not by the Association will be carried out by South West Research Institute. Financial support is adequate and includes one European company subscription.

MCA will publish the report on this research probably in the 1972-73 year; therefore, the budget item of \$2,500 for this service, unused in 1971-72, should be carried forward.

(d) Task Group on Procedures for Handling Large Accidental Spills of Hazardous Materials

Mr. J. J. Walker requested additional comments on the draft his task group had prepared. The task group will make a further recommendation at the next meeting.

9. Liaison with Works Safety Committee of Chemical Industries Association

The period June 12-16, 1972 was suggested for the visit by members of the Safety and Health Committees of MCA to the U.K.

The purpose of the visit will be to study the operation of government factory inspectorate in the administration of occupational safety and health legislation; to study government safety and health advisory services and the work of the Chemical and Allied Products Industry Training Board; to attend meetings of the CIA Safety and Medical committees and visit chemical plants.

10. National Fire Protection Association

Mr. M. E. Woodworth indicated that NFPA standards are being reviewed with intent to incorporate footnotes to standards in the body of the text. Omission of certain of these footnotes by OSHA in adopting consensus standards is the reason for this activity.

11. OSHA Standard 1910.106 Regarding Containers for Flammable Liquids

Members had received copies of the MCA letter to the Assistant Secretary of Labor for OSHA in which a request was made for reinstatement of the footnote exempting high purity chemicals from the regulation.

Mr. J. M. Pardee reported that at a conference of reagent and fine chemical manufacturer members of MCA on December 13 it was agreed that a second letter from MCA to Mr. Guenther should include a recommendation for inclusion of the following as a footnote to Table H-12:

"Flammable or combustible liquids whose purity would be affected by metal containers or would result in excessive corrosion of such containers shall be exempt from the requirements of subdivisions (i) and (iii) of this subparagraph."

During discussion it was revealed that NFPA is considering more specific wording as an amendment to the current footnote in NFPA 30, largely as follows:

"Class 1A or 1B flammable liquids may be stored in glass containers of not more than one gallon capacity if the liquid purity would be destroyed by metal containers or if the liquid would cause excessive corrosion of the metal container."

With the concurrence of Mr. C. Dickson and Mr. G. L. Pillori of Fisher Scientific Company and Mr. R. E. McIlroy of J. T. Baker Chemical Company representing fine chemical manufacturers, it was agreed to adopt this wording for the MCA recommendation in lieu of the wording developed on December 13.

It was agreed that the MCA letter should request a postponement of the effective date of the current regulation if an amendment cannot be obtained by February 15, 1972.

A need for better committee coordination in the review of standards promulgated under the Occupational Safety and Health Act was expressed. The Chairman agreed to appoint a task group to make a recommendation as to how this could be achieved. The task group will report at the next meeting.

12. Meeting Schedule for 1972

March 7	Committee Meeting, Washington, D. C.
May 23	Safety Workshop, New Jersey Area
May 24	Committee Meeting, New Jersey Area
September 19	Committee Meeting, Washington, D. C.
December 12	Committee Meeting, New York City

13. Appointment of Officers

The Chairman announced that he will appoint a nominating committee for the offices of Chairman and Vice-Chairman for the period June 30, 1972 - June 30, 1973.

Minutes subject to approval
FGS:ckm
12/22/71