

MANUFACTURING CHEMISTS ASSOCIATION
MINUTES OF MEETING
LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

STOUFFER'S NATIONAL CENTER HOTEL
Arlington, Virginia January 28, 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
S. W. Beckstead	Kerr-McGee Chemical Corporation
H. A. Birnbaum	3 M Company
C. P. Brush	Koppers Company Inc.
L. W. Burnette	GAF Corporation
R. H. Dewey	Commercial Solvents Corporation
E. M. Dixon	Celanese Corporation
H. B. Doolfalk (a)	Diamond Shamrock Chemical Company
R. F. Ingham	Mallinckrodt, Inc.
Robert Jelus	MC/B Manufacturing Chemists
H. H. Klein (b)	Olin Corporation
M. B. Lore	E. I. du Pont de Nemours & Company
J. S. Mackay	U. S. Steel Corporation
Paul Neiman (c)	Exxon Chemical Company U.S.A.
C. B. Shaffer	American Cyanamid Company
G. Robert Sido	Monsanto Company
Philip Sonneborn	Fisher Scientific Company
C. J. Stroemple	PPG Industries, Inc.
J. R. Taylor	Allied Chemical Corporation
R. G. Troup	J. T. Baker Chemical Company
A. G. Wheeler	ICI United States Inc.
J. T. Seawell	MCA Staff

- (a) For R. Craig Andrews
- (b) For R. F. Philpitt
- (c) For J. W. Hammond

MEMBERS ABSENT

G. S. Batchelor
C. U. Dernehl
Donald MacKellar
T. R. Madden
R. E. Rutherford
Walter Schleyer
A. W. Sheldon
J. V. Urenovitch

Virginia Chemicals Inc.
Union Carbide Corporation
FMC Corporation
Reichhold Chemicals Inc.
Gulf Oil Corporation
Philadelphia Quartz Company
M&T Chemicals Inc.
Air Products & Chemicals Inc.

GUESTS

D. V. Anderson
Delmer F. Billings
A. G. Chasar
R. J. Dowling
P. G. Elsey
R. L. Finocchio
James F. Lemen
Kathleen A. Logan
James A. O'Connor
Orton Overman
J. K. Peterson
Julius Rakus
A. T. Talcott
Judith A. Tins
James J. Trexel
Jack Turer
Anne Waggoner

Amoco Chemicals Corporation
MC/B Manufacturing Chemists
Mobil Oil Company
Uniroyal Chemical
Ethyl Corporation
PPG Industries, Inc.
Hooker Chemicals & Plastics Corp.
Pennwalt Corporation
The Harshaw Chemical Company
Stauffer Chemical Company
U. S. Steel Corporation
Dart Industries, Inc.
The Dow Chemical Company
Celanese Corporation
E. I. du Pont de Nemours & Company
Witco Chemical Company
MCA Staff

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1.0 Approval of Minutes of November 13, 1975 Meeting

The minutes of the November 13, 1975 meeting were approved as recorded.

2.0 Report on the Status of the ANSI Standard Z129.1 on the Precautionary Labeling of Hazardous Industrial Chemicals

Dr. Warren H. Jones presented a review of the status of the ANSI Standard Z129.1 together with a report on the resolution of negative positions.

- 2.1 The Results of Meetings in the New York Headquarters of the American National Standards Institute between Members of the LAPI Subcommittee on the Proposed ANSI Standard, Members of the ANSI Board of Standards Review, Members of the ANSI Staff, with representatives of the American Petroleum Institute (API) and the National Fire Protection Association (NFPA)

Dr. Jones described how the negative ballots of API and NFPA were resolved during the above-mentioned meetings and, how in so doing, the positions of the three organizations concerned i.e., MCA, API, and NFPA, were preserved.

When working to preserve the well-founded MCA/LAPIC position during the ANSI meetings, Dr. Jones explained that a flash point below 20°F has been used to characterize liquids labeled as extremely flammable by the State of Michigan and other states as well. He called attention to the fact that this breakpoint has been in use for some 30 years. Since this flash point concerns labels which apply not only to the manufacturer but also to the ultimate user, such a flash point serves as "a preventive measure to protect the worker in the workplace." The MCA/LAPIC position was sustained and the negative positions of API and NFPA were resolved in the Standard by two amendments:

- 1) A footnote reading as follows:

"Some states and other regulatory agencies require that products with flash points below 20°F (6.7°C) be labeled as 'EXTREMELY FLAMMABLE', and

- 2) The following change in the Flammable Liquid definition:

"Flammable Liquid - any liquid having a flash point below 100°F (37.8°C) except any liquid mixture having one or more components with a flash point at or above the upper limit which make up 99% or more of the total volume with a mixture.

See flash point definition for test method."

Dr. Jones emphasized that Z129.1 is no longer in the proposed category as it is an adopted Standard. The date of adoption was January 15, 1976.

He further reported that the manuscript is now in the hands of the ANSI editorial staff and its progress is being closely monitored by Mr. Nixon de Tarnowsky.

2.2 Report of these Subcommittee Meetings held on January 27, 1976 on ANSI Standard Z129.1 and Recommendations Evolving from this Meeting

Dr. Jones pointed out that it was the mission of the Subcommittee during its meeting on January 27, 1976 to develop and outline proposals which the Subcommittee could bring to the full Committee regarding plans for handling this Standard.

He emphasized that the Standard will be published by the American National Standards Institute and cited the reasons why this is advisable.

He then presented three motions resulting from the deliberations of the Subcommittee. These are as follows:

Motion 1:

The Subcommittee on ANSI Standard Z129.1 on Precautionary Labeling recommends that MCA endorse ANSI Z129.1 as the current Standard for the Precautionary Labeling of Hazardous Industrial Chemicals.

Motion 2:

That the Labels and Precautionary Information Committee recommend that MCA submit the ANSI Z129.1 Standard for the Precautionary Labeling of Hazardous Industrial Chemicals to the Secretary of Labor for consideration for adoption as an Occupational Safety and Health Standard.

Motion 3:

The Subcommittee on ANSI Standard Z129.1 moves that a Manual Revision Subcommittee be appointed and directed to study matters relevant to the continuation of Manual L-1. This Subcommittee is to present its first interim report to the full Committee at the next regular meeting. Initially it will be concerned with recommendations regarding continued publication and a suggested format.

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After due consideration, each of the three motions presented above passed unanimously.

After favorable action on the third motion, the Chairman appointed a Manual Revision Subcommittee comprised of the following gentlemen:

Chairman:	Mr. Charles P. Brush	Koppers Company Inc.
	Mr. G. Robert Sido	Monsanto Company
	Mr. Morris B. Lore	E. I. du Pont de Nemours
	Mr. Ralph G. Troup	J. T. Baker Chemical Co.
	Dr. Warren H. Jones	Eastman Kodak Company
	Mr. A. T. Talcott	The Dow Chemical Company
	Mr. R. F. Philpitt	Olin Corporation
	Mr. Robert F. Ingham	Mallinckrodt, Inc.

Appointment of the above-mentioned gentlemen to the Manual Revision Subcommittee evolved from earlier work of Mr. M. B. Lore who was requested by the Chairman during the November 13, 1975 meeting to give consideration to (1) the membership of this important Subcommittee and, (2) when work should be started on the revision of the LAPI Manual vis-a-vis the outcome of action on ANSI Standard Z129.1.

Mr. Lore also outlined the results of his recent considerations of the Manual, especially his deliberations concerning possible formats. He recommended to the full Committee that the members send their viewpoints on possible formats to the Manual Revision Subcommittee Chairman, Mr. Charles Brush at the earliest possible time.

3.0 A Presentation by Dr. C. Boyd Shaffer on:

"The Work of the OSHA Standards Advisory Committee on Hazardous Material Labeling and the Implications of its Recommendations with Respect to LAPI Projects."

Dr. Shaffer began his presentation by saying that in order to present to the members of the LAPI Committee a status report that was as current as possible, he had recently contacted members of the Advisory Committee Management Office. Personnel in this

office had advised him that consideration of and action on a Standard on the Labeling of Hazardous Material was on "a back burner" and that during the coming months there would be essentially no activity. Dr. Shaffer emphasized that this gives the ANSI Standard an opportunity "to develop" and LAPI time to take appropriate action on this Standard during the period immediately following its availability as a published document.

Dr. Shaffer then proceeded with a review of the activities of the Advisory Committee to include the following:

- 1) Recommendations and actions on Material Safety Data Sheets.
- 2) Posting in the workplace.
- 3) Emphasis that one of the first missions of the Advisory Committee was to identify and define hazardous materials. Dr. Shaffer pointed out that these definitions were essentially those as presented in the LAPI Manual.
- 4) NIOSH recommendations on labeling.
- 5) Emphasis of the fact that labor representatives were not impressed "with LAPI language" as presented in the Manual. Dr. Shaffer pointed out that the reason for this was that perhaps this language was too technical and too involved.
- 6) Mr. Woodworth supports strongly 704M.
- 7) The Advisory Committee favors the LAPI Manual system but with symbols.
- 8) The report of the Advisory Committee carries provisions for UN symbols and it was the intention of the Advisory Committee that all available UN symbols be used.
- 9) Labor is impressed with requirements for Material Safety Data Sheets.

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- 10) Where necessary employees can go to the supervisor and request to see a copy of the Material Safety Data Sheet.

Dr. Shaffer further emphasized that the final recommendations of the Advisory Committee were "remarkably in common with the new ANSI Standard Z129.1."

Dr. Shaffer called particular attention to the fact that an important point of the Advisory Committee's recommendation concerned the point that there must be more "disclosure of ingredients."

4.0 Explorations into the International Implications of the ANSI Standard Z129.1

The Chairman requested that Mr. G. Robert Sido form a Subcommittee for the purpose of exploring all pertinent international implications of both the new ANSI Standard Z129.1 and the future of a revised LAPI Manual, as well. At a later point during the meeting, Mr. Sido gave the Chairman a list of those willing to serve on this Subcommittee. The gentlemen indicating their willingness to serve in this capacity are as follows:

Mr. Paul G. Elsey	Ethyl Corporation
Mr. Herman A. Birnbaum	3 M Company
Mr. John R. Taylor	Allied Chemical Corp.
Mr. A. G. Wheeler	ICI United States Inc.

5.0 Meeting Arrangements

On January 8, 1976 the Secretary forwarded to all members of LAPI a number of possible plans designed to crystallize thinking on meeting plans and/or arrangements. There was also forwarded a questionnaire which gave the members an opportunity to select one of three proposed plans drafted by the Secretary or, in the event that none were satisfactory, a provision for the member to submit his own original plan.

The results of the balloting were reported to the full Committee and showed that a majority of members favored a one-day meeting. It was the consensus of opinion that during the foreseeable future, one-day meetings would be held until such point that the agenda required more lengthy meetings.

At the request of the Chairman of the Subcommittee on Meeting Arrangements, the following firm commitments have been signed with Stouffer's for a meeting and luncheon on the following dates:

May 26, 1976
October 27, 1976
January 6, 1977

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6.0 Report on the Work of the Inter-Committee Task Group on Hazard Information Systems

Dr. Warren Jones reported that the Inter-Committee Task Group on Hazard Information Systems will meet on February 4, 1976 for the purpose of considering the final draft of a recommended response to Materials Transportation Bureau Docket No. HM-126, Hazard Information Systems.

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He reported that representatives of MCA have met separately and jointly with representatives of the Association of American Railroads and the American Trucking Association to determine areas of mutual agreement and to ascertain their current thinking on a Hazard Information System.

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7.0 Rotation Procedures

A combined report was presented on the work performed by the Membership Review Board and the Subcommittee comprised of Dr. C. U. Dernehl and Mr. M. B. Lore. The Chairman of the LAPI Committee (who is also Chairman of the Membership Review Board) explained that an attempt was being made to minimize the possible effects of rotation. He further explained that prior to initiating rotational procedures, each member would be contacted by letter in an effort to ascertain the members intentions, i.e., whether or not his corporate assignment would enable him to continue to serve as a member of LAPI or if corporate assignments, resignations, etc., would markedly reduce the need for rotation.

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At this point in time, no further action will be taken with respect to the drafting of a request to the Board of Directors for an increase in membership of the LAPI Committee.

8.0 Reports on Requests for Committee Decisions and Actions on the following:

8.1 Recommended Changes in the Safety Data Sheet on Hydrogen Peroxide Evolving from Data Developed by PPG Industries

The Hydrogen Peroxide Subcommittee appointed by Mr. O'Connor 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. E. Hinkley	PPG Industries, Inc.

The Subcommittee ascertained that the PPG data are the only set of results showing the effects of eye exposure to different hydrogen peroxide concentrations. There is not available to MCA acute toxicity data for hydrogen peroxide labeling.

PPG is having a retest made on the effects of eye exposure to 50% hydrogen peroxide. An evaluation of eye exposure to 35% hydrogen peroxide also will be made. If these studies show a higher degree of hazard than that indicated by the present MCA labeling, PPG will revise the hydrogen peroxide labels utilizing the label guidelines as published by the LAPI Committee.

Dr. Ernest M. Dixon of the Celanese Corporation will review the PPG data when it is made available.

8.2 Phraseology on Labels Regarding Medical Assistance

Appropriate considerations of and action on 8.2 and 8.2.1 has been the responsibility of a Subcommittee comprised of: Dr. Carl Dernehl, Chairman, Union Carbide, Dr. Warren Jones, Eastman Kodak, and Mr. R. Craig Andrews, Diamond Shamrock.

The following quotation is taken from an opinion supplied by Mr. R. Craig Andrews:

"Specifically, we have been asked to consider whether an individual exposed to toxic or highly toxic substances should be directed to obtain medical attention, rather than to call a physician. In the past, LAPI has recommended that the words 'Call a Physician' be included in the precautionary labeling appearing on such products.

"While a review of the case law has not yielded a case precisely on point, it would appear from a legal standpoint, that there is implied warranty that instructions appearing on a label are sufficient in case of exposure. Thus, if the assistance of a physician is necessary, a label which did not contain such a direction would appear to result in a breach of warranty. Further, the failure to provide such a direction may well constitute actionable negligence.

"In Griffin vs. Planters Chemical Corporation, 202F Supp. 937 (1969), it was held that a label which was used on bags of 1% parathion dust, manufactured and distributed by the defendant, and which contained no skull and cross bones, did not list an antidote and did not advise persons exposed to call a doctor immediately, considering that product was inherently dangerous, was incomplete and inadequate, regardless of whether it met the labeling requirements of the Secretary of Agricultural.

"In view of the foregoing, it is suggested that the phrase 'Call a Physician' or 'Call a Doctor' be retained on labels recommended for substances where exposure requires the attention of a physician."

A motion was made and carried that the recommendation of the Subcommittee be accepted -- a recommendation that the phrase "Call A Physician At Once" be used.

8.2.1 Referral from Occupational Health
Committee Regarding Recommended Changes
in Safety Data Sheet on Benzene, SD-2,
and Toluene, SD-63

Subcommittee action on this item has not been completed. A recommendation has been presented to the LAPI Committee that the Safety Data Sheets for Benzene and Toluene be updated to include OSHA's new standards for TLV's and the inducing of vomiting for any ingestion should not be recommended as long as the neat products are involved.

8.3 Action on Inquiry from Blakeny Associates
 Regarding the Recommended Label for Containers
 of Propylene and Chemical Safety Data Sheet,
 SD-59

 Action on this inquiry was the responsibility of
Mr. John R. Taylor of Allied Chemical Corporation and Mr. Morris B.
Lore of E. I. du Pont de Nemours.

Mr. Taylor has reported as follows:

 "Mr. Lore and I believe that the phrase should
be changed to read - 'Store Cylinder Out of Sun and
Away from Heat'.

 "The cylinder can safely be used out of doors
but it is believed to be feasible and wise for storage
to be in locations protected from the sun.

 "The higher vapor pressures of compressed gases
at elevated temperatures produce additional stress on
the cylinders which should be minimized as much as
possible."

8.4 Recommendations of Subcommittee on Labeling
 Regarding Vinyl Chloride Monomer

 Mr. Orton Overman has submitted a vinyl chloride
label (see Appendix I) with the proposed change to include the
statement "Cancer-Suspect Agent." This label conforms to the
requirements as outlined in 29 CFR 1910.93 (q) (1) (5) (i) as
printed in the Federal Register of October 4, 1974, page 35898.

 Mr. Overman reports that Mr. C. K. Dilley, Chairman of
the Vinyl Chlorine Committee, Compressed Gas Association, has
been contacted and agrees with the format as presented.

 Mr. G. Robert Sido submitted data on the subject of
merging "CANCER-SUSPECT AGENT" messages with LAPI label text.
Mr. Sido submitted examples to those in attendance based on
arsenic and its compounds. He submitted a label on arsenic
trioxide as a recommended pattern for merging the required
labeling data and for inclusion in the next issue of the Arsenic
Trioxide Data Sheet, SD-60.

Following appropriate discussions of both of these related subjects, a vote was taken and there were no objections to the addition of the phrase "Cancer-Suspect Agent." Although Committee action endorses the addition of the foregoing phrase, it is to be emphasized that the decision as to the location of this phrase in the leading group of precautionary statements in a label has not been finalized.

A Subcommittee was appointed by the Chairman to resolve outstanding labeling structure as it relates to proposed and promulgated regulations. This Subcommittee is comprised of the following:

Mr. G. Robert Sido	Monsanto Company
Miss K. A. Logan	Pennwalt Corporation
Mr. R. E. Rutherford	Gulf Oil Corporation
Mr. J. J. Trexel	E. I. du Pont de Nemours

8.5 Report of the Subcommittee on Chemical Safety
Data Sheet SD-95, Phosgene

This document is acceptable as submitted with exception that any qualifying phrase following a recommendation that a physician be called should be eliminated.

9.0 New Requests for Committee Decisions and Actions on the
Following Chemical Safety Data Sheets

9.1 Procedure to be Followed on the Preparation of
Labels for Inclusion in Safety Data Sheets

The Secretary was requested to record that Subcommittees established for the purpose of preparing labels for specific Data Sheets will not take final action on any label until the Final Draft of the entire Safety Data Sheet is in hand.

Of the following Safety Data Sheets on which labeling action is pending, only two (Chromic Acid, SD-44; and Sodium and Potassium Dichromate, SD-46) are currently in the form of Final Drafts. As the drafts of the remaining Safety Data Sheets become available, they will be mailed to the appropriate Subcommittee members as soon as possible.

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The Secretary has been informed by the Secretary of the Safety and Fire Protection Committee that there will also be made available to the LAPI Subcommittee members copies of the First draft and the Proposed Final Draft of Safety Data Sheets. While admittedly these will not be the Final Draft, this action will afford lead time for the consideration of an appropriate label and thereby accelerate the overall Safety Data Sheet revision procedure.

9.2 Action on Safety Data Sheet SD-57, Methylamines

Appropriate consideration of and action on this item will be the responsibility of a Subcommittee comprised of:

Mr. R. H. Dewey, Chairman	Commercial Solvents Corp.
Mr. L. W. Burnette	GAF Corporation
Mr. J. J. Trexel	E. I. du Pont de Nemours

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

Appropriate action on this item will be taken by:

Mr. J. R. Taylor	Allied Chemical Corp.
Mr. R. C. Andrews	Diamond Shamrock Chem. Co.

9.4 Action on Safety Data Sheet SD-46, Sodium and Potassium Dichromate

Action on this item will be the responsibility of:

Mr. C. J. Stroemple	PPG Industries, Inc.
Mr. R. F. Ingham	Mallinckrodt, Inc.

The Chairman requested that the Subcommittee members send information copies of any of their actions to Messrs. R. C. Andrews and J. R. Taylor.

9.5 Action on Safety Data Sheet SD-67, Hydrocyanic Acid

The Chairman requested that action on this item be taken by:

Mr. M. B. Lore	E. I. du Pont de Nemours
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9.6 Action on Safety Data Sheet SD-30, Sodium Cyanides

The Chairman further requested that action on this item be taken by:

Mr. A. Thayer Talcott	The Dow Chemical Company
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9.7 Action on Safety Data Sheet SD-43, Acetaldehyde

Action on this item will be taken by:

Dr. E. M. Dixon	Celanese Corporation
Dr. Warren H. Jones	Eastman Kodak Company

9.8 Action on Safety Data Sheet SD-102, Chlorosilanes

Appropriate action on this item will be the responsibility of:

Mr. Orton Overman	Stauffer Chemical Co.
Mr. A. Thayer Talcott	The Dow Chemical Company

10.0 Recommendations on Salt as an Emetic

10.1 Will LAPIC agree to the elimination in future documents of reference to salt as an emetic, and substitute instead the proposed phrase "induce vomiting?"

10.2 What is the opinion of LAPIC on the action which should be taken with respect to reference to salt as an emetic in existing documents?

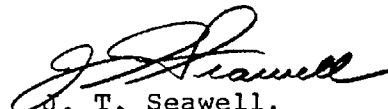
Appropriate actions on the above-mentioned items will be the responsibility of a Subcommittee comprised of the following:

Dr. E. M. Dixon	Celanese Corporation
Dr. C. U. Dernehl	Union Carbide Corp.
Dr. Warren H. Jones	Eastman Kodak Company

11.0 Preparation of Section II for the ANSI Standard Z129.1
by the Compressed Gas Association (CGA)

As a result of earlier agreements, the Compressed Gas Association is to prepare Section II for the ANSI Standard Z129.1. This Section is to deal specifically and exclusively with compressed gases.

The Chairman requested that Dr. W. H. Jones of Eastman Kodak Company and Mr. D. V. Anderson of Amoco Chemicals Corp. conduct all necessary liaison with the CGA. Information on the progress of the above-mentioned Section will be secured at the earliest possible time.


J. T. Seawell,
Secretary

JTS:er

Minutes subject to approval.

February 25, 1976

VINYL CHLORIDE

DANGER! EXTREMELY FLAMMABLE LIQUID AND GAS
UNDER PRESSURE

CANCER-SUSPECT AGENT

HARMFUL IF INHALED

MAY POLYMERIZE VIOLENTLY UNDER FIRE
CONDITIONS OR LOSS OR REMOVAL
OF INHIBITOR

Keep away from heat, sparks, and open flame.

Keep container closed.

Use with adequate ventilation.

Avoid breathing vapor.

Avoid contact with skin.

Keep cylinder out of sun and away from heat.

Container should be grounded when being emptied.

Never drop cylinder.

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.

In case of:

Fire — Use water spray, dry chemical, or CO₂.

Spill or Leak — For small spills, evacuate area and permit to evaporate. For large spills or leaks, evacuate area. Dike or flush to ground and let evaporate. Do not flush to sewer because of explosion hazard.

MCA Chemical Safety Data Sheet SD-56 available.

1-28-76

*Per Orton Overman Stauffer Chemical Co.
This was endorsed by OSHA 29 CFR 1910.93p
and shown in the Fed. Register 10-4-74
and with this editorial change 12-3-74
page 41848*

GR SCD