

Manufacturing Chemists Association

MINUTES OF MEETING

LABELS AND PRECAUTIONARY INFORMATION COMMITTEE

January 25-26, 1972

MCA Conference Room

Washington, D. C.

Members Present

G. R. Sido, Chairman
A. W. Sheldon, Vice Chairman
R. C. Andrews
S. W. Beckstead
H. A. Birnbaum
D. E. Brown
C. P. Brush
L. W. Burnette
C. U. Dernehl, M.D.
R. H. Dewey
E. M. Dixon, M.D. (1/25)
J. T. Gormally
J. W. Hammond (1/25)
E. J. Hogan
W. H. Jones, M.D.
M. B. Lore
Clarence Lowery (1/25)
D. G. MacKellar
R. F. Philpitt
R. E. Rutherford
C. B. Shaffer (1/25)
Wayne Stringer (for H. H. McIntyre)
C. J. Stroemple (for W. L. Hammond)
R. G. Troup
M. M. Hoover, Secretary

Monsanto Company
M&T Chemicals Inc.
Diamond Shamrock Corporation
Kerr-McGee Chemical Corp.
3M Company
Mallinckrodt Chemical Works
Koppers Company, Inc.
GAF Corporation
Union Carbide Corporation
Commercial Solvents Corporation
Celanese Corporation
Pennwalt Corporation
Enjay Chemical Company
Allied Chemical Corporation
Eastman Kodak Company
E. I. du Pont de Nemours & Company
MC&B Manufacturing Chemists
FMC Corporation
Olin Corporation
Gulf Oil Corporation
American Cyanamid Company
The Dow Chemical Company
PPG Industries, Inc.
J. T. Baker Chemical Company
MCA Staff

Guests Present

J. S. Mackay
P. E. Neiman
J. J. Robinson
P. G. Stephenson (1/25 AM)

USS Chemicals
Enjay Chemical Company
Mobil Chemical Company
MCA Staff

Guests Present (cont.)

Jack Turer
Peggy Walton (1/26)
A. G. Wheeler

Witco Chemical Corporation
MCA Staff
ICI America Inc.

Members Absent

W. L. Hammond
H. H. McIntyre
J. J. O'Connor
M. G. White

PPG Industries, Inc.
The Dow Chemical Company
Stauffer Chemical Company
Shell Chemical Company

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1. MEETINGS

a. Minutes of Last Meeting - The minutes of the September 22-23, 1972 meeting were approved as distributed.

b. Next Meeting - It was decided to hold the next meeting June 6-7, 1972 in Rochester, N. Y.

2. MEMBERSHIP

The committee voted unanimously to recommend to the MCA Board of Directors that R. C. Andrews of Diamond Shamrock Corporation be appointed a member of the committee to succeed E. J. Masek. Mr. Masek's very substantial contributions to the work of the committee during his thirteen-plus years as a member and during his terms as vice chairman and chairman were noted.

3. LIAISON ACTIVITIES

a. American Congress of Governmental Industrial Hygienists - Mr. Hammond reported that there has been no meeting of this group since last May, and that its activity has been largely taken over by the National Institute for Occupational Safety and Health. He referred to the January 19 memo from the secretary of the MCA Occupational Health Committee on the subject "Notice of Intended Changes in 1972 TLV's." Copies of this memo were distributed at the meeting.

b. American National Standards Committee Z35 (Hazard Symbols) - The secretary reported that MCA comments re proposed American National Standard Z35.3 were sent to ANSI December 6. Copies of these comments were sent to LAPIC the same day. These comments reflect the draft prepared by the Pictorial Labeling Subcommittee (see Minute 4 b).

c. American Petroleum Institute - Mr. Hammond reported that the API Committee on Precautionary Labeling met October 13, and that a new chairman will be chosen to succeed Allan Dooley who is retiring.

d. Association of American Pesticide Control Officials - The secretary read Mr. Lore's report of October 19 covering the October 14 meeting of the AAPCO Precautionary Labeling Committee.

e. Chemical Industries Association Ltd. - The secretary reviewed his report which was sent to the committee January 5. (See also Minute 3 h.)

f. Chemical Specialties Manufacturers Association - Mr. Hogan reported on the December meeting of CSMA Labeling and Regulatory Advisory Committee.

g. Environmental Protection Agency - Dr. Shaffer reported on a meeting he and Dallas Sparre of CSMA had on January 24 with Dr. Greenman of EPA/PRD on the subject of label language. Dr. Greenman was urged to adopt standard test procedures and to make known to industry what standard language (if any) is being used for the various hazards, but he did not feel PRD is in a position to adopt standard language according to hazard as provided for in Dr. Hays' proposed revision to Interpretation 18, which is not favored by state officials.

h. European Economic Community - Mr. Hogan referred to the item which appeared in the December 10 issue of the MCA General Bulletin concerning the January 1, 1972 effective date for the Directive on Substances. He also urged that comments on those portions of the CIAL minutes and two accompanying reports sent to the committee December 15 which pertain to EEC Directives be sent to him with copies to the committee officers.

i. Inter-Industry Advisory Committee on Product Information - Mr. Hogan reported that there has been no meeting of this committee since the last LAPIC meeting.

j. MCA Board of Directors - The chairman requested that any comments committee members may have concerning systems for rating environmental performance (reference: minutes of the November 23 meeting of the Board Liaison Committee for Environmental Quality and Control which were sent to LAPIC December 6) be sent to him immediately in preparation for February 8 meeting of this Board Liaison Committee.

k. MCA Ad Hoc Committee on Chemicals Regulation - Dr. Shaffer reported on S. 1478, Toxic Substances Control Act of 1971, and

Senator Spong's substitute bill (A. 338), concerning which bills he testified on behalf of MCA November 5.

l. MCA Public Relations Department - Following a discussion with Mrs. Walton concerning information from consumer groups that would be helpful to the committee, the chairman said he would appoint a task group to develop specific questions. On another subject, Mrs. Walton said that committee members would be most welcome to assist in manning MCA Consumer Information exhibits, where they would have a good opportunity to learn consumer opinions and be helpful in explaining the chemical industry to consumers. Dates for these exhibits are June 6-9 (Denver, General Federation of Women's Clubs), June 27-29 (Detroit, American Home Economics Association), October 9-12 (Denver, National Association of Extension Home Economists), and October 22-25 (Dallas, Girl Scouts of the United States).

m. MCA Occupational Health Committee - Dr. Birnbaum reported briefly on OHC activities.

n. MCA Safety and Fire Protection Committee - Mr. Stephenson reported on developments involving safety data sheets and related matters, covered partially in the secretary's report on activities related to the SFPC which was sent to LAPIC January 6. He indicated that plans were being made for better coordination among various MCA committees with respect to regulations of the Occupational Safety and Health Administration.

o. National Agricultural Chemicals Association - The chairman reported that a scheme developed by a task group of the NACA Regulatory Advisory Committee for the labeling of extremely toxic products has been approved by NACA. He also reported on the recommended consumer protection panel for use on household pesticide labels which was developed by the NACA Container Committee. LAPI Committee members felt that this panel should be encouraged for some situations but should not be made a requirement.

p. National Fire Protection Association - Mr. Stringer reported for Mr. McIntyre that voting on the question of adopting the NFPA No. 704M Guide (Identification of the Fire Hazards of Materials) as an NFPA standard failed to get the necessary two-thirds majority, and that the matter was therefore dropped.

q. National Paint and Coatings Association - The secretary reported that a revision of the NPCA Recommended Precautionary Labeling pamphlet has been completed with the pamphlet now under review by FDA, and that the special NPCA Task Force on Material Safety Data Sheets is submitting recommendations to the U. S. Department of Labor calling

for a more simplified form. Mr. Lore reported that there will be a meeting of the NPCA labeling committee March 7.

r. U. S. Department of Defense - The chairman reported that one illustration of simplified color handling did not get into Federal Standard 313, but that this might be worked in later. The secretary noted the item which appeared in the December 10 MCA General Bulletin concerning this Federal standard. A copy of the FEDERAL REGISTER notice concerning publication of this standard was sent to the committee November 19.

s. U. S. Department of Labor - With regard to the anticipated adoption by USDL of Federal Standard 313, the committee voted (with two negatives) in favor of MCA's taking the position that only one symbol system should be adopted by Federal agencies, and that the NFPA No. 704M system should not be this single system. The committee also voted (with one negative) to recommend that a letter be sent by MCA to the USDL secretary proposing a single system for Federal agencies and stating MCA's willingness to work towards it.

t. U. S. Department of Transportation - With regard to the anticipated adoption by USDT of the Hazard Information system, the committee voted (with two negatives) in favor of MCA's taking the position that only one symbol system should be adopted by Federal agencies, and that the NFPA No. 704M system should not be this single system. The committee also voted (with one negative) to recommend that a letter be sent by MCA to the USDT secretary proposing a single system for Federal agencies and stating MCA's willingness to work towards it.

u. United Parcel Service - The chairman distributed information concerning the proposed UPS Hazardous Materials Manual and a January 27 meeting in San Francisco to review copies of it.

4. OTHER ACTIVITIES

a. Manual Revision - Mr. Troup reported on the October 27 meeting of the Manual Revision Subcommittee. The minutes of this meeting, which were sent to the full committee October 29, took note of reasons why the subcommittee felt it may be pointless to put a lot of effort into a revision of Manual L-1, and listed the subcommittee recommendations which contain the recommendation that MCA should assume the secretariat duties of the ANSI Z129 project involving the formation of a standards committee to develop labeling standards, if the feasibility of a joint effort is first determined at a meeting with representatives of other organizations, and if it is determined at this meeting that the project should be under ANSI auspices.

b. Pictorial Labeling - Mr. Troup reported on the November 23 meeting of the Pictorial Labeling Subcommittee. The minutes of this meeting, which were sent to the full committee November 29, mention that the subcommittee met for the purpose of developing an MCA response to the "Call for Comment" from the American National Standards Institute concerning Proposed American National Standard Z35.3 - Hazard Symbols for Consumer Products, that a draft MCA response was prepared at this meeting, and that this draft expressed reluctance to adding another symbol system to those already in use and recommended a conference to consider the feasibility of a uniform system of hazard symbols to protect the public. The MCA response sent to ANSI reflected the draft as noted in Minute 3 b.

c. Manual L-1 Canvass - Mr. Sheldon reported that replies have been received from nine of the twelve organizations which voted negatively on the question of adopting Manual L-1 as an American National Standard, and that all nine reaffirmed their original negative vote. He also reported that many of the comments associated with these negative votes took issue with the definition for flammability. In the light of this negative response, and in light of the actions taken by the Manual Revision and Pictorial Labeling Subcommittees (see Minutes 4 a and 4 b above), the full committee on a vote of 16-4 recommended that MCA proceed along the ANSI standards committee route to develop a precautionary labeling standard.

d. Labeling for Genetic and Tumorigenic Effects - Dr. Dernehl reported that no conclusions have been reached yet by his task group. The committee chairman indicated that Messrs. Dixon, Jones, Shaffer, and Troup have been appointed to assist the task group chairman.

e. Label for SD-6 (Paraformaldehyde) - Dr. Birnbaum reported that the draft label is not yet ready to be put before the committee.

f. Label for SD-8 (Anhydrous Ammonia) - An amended version of the draft sent to the committee January 17 was approved.

g. Label for SD-13 (Aqua Ammonia) - An amended version of the draft label sent to the committee January 17 was approved.

h. Label for SD-51 (Ethyl Acetate) - The draft label as sent to the committee December 27 was approved.

i. Label for SD-56 (Vinyl Chloride) - An amended version of the draft label sent to the committee January 17 was approved.

j. Label for SD-98 (Allyl Chloride) - It was decided to handle

L-725

the draft label by letter ballot if necessary to avoid delaying publication of the data sheet.

k. Label for SD-99 (Isopropanol) - An amended version of the draft label distributed at the September meeting was approved.

M. M. Hoover

M. M. Hoover, Secretary

MMH:tp
February 7, 1972

cc: Board Liaison Committee - Environment

Distribution "A"