

UNION CARBIDE AND CARBON CORPORATION

30 East Forty-second Street
New York 17, New York

October 8, 1954

Mr. Manfred Bowditch
Director of Health and Safety
Lead Industries Association
420 Lexington Avenue
New York 17, New York

My dear Manfred:

You asked me to send you a note on the subject of the Eagle-Picher Company warning labels for lead products. The concern seems to be as to whether the labels, copies of which you sent me, would be adequate and comply with the regulations in New York State and New York City as I understand they do with the codes in California and Illinois.

The codes referred to all follow essentially the principles for precautionary labeling published by the Manufacturing Chemists' Association in their Manual I-1, "Warning Labels." Naturally, it would be a question for the enforcement agency to determine whether or not a given label is satisfactory under their code, and it would not be a function of the M.C.A. to make such determinations. Obviously, if experience indicates that the originally accepted label does not satisfactorily cover the situation, a change might be required by the enforcement agency. In the present case, I understand, the Eagle-Picher Company wishes to learn whether these labels would be acceptable under the New York State and New York City codes. In the case of New York City, I understand that they have stated that at present these labels would appear to meet with their regulations.

Whether or not a given label is acceptable under a given code seems to be readily answerable, yes or no, by the administering agency of the code. It would not seem that there should be any need to confer with the M.C.A. as to interpretation of the code, even though such a code might have evolved in collaboration with the M.C.A. Therefore, I am a little at a loss to understand why in the case of the New York State code they cannot give a direct answer based on their own interpretation of their own code. As a disinterested observer, it would seem to me that these labels prepared by the Eagle-Picher Company should be satisfactory under any of the codes mentioned.

Very truly yours,

/s/ A. G. Cranch
MEDICAL CONSULTANT

A. G. Cranch, M. D.

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LEAD INDUSTRIES ASSOCIATION

420 Lexington Avenue

New York 17, N. Y.

MANFRED BOWDITCH
DIRECTOR OF HEALTH AND SAFETY

October 11, 1954

Mr. S. T. Barker
Assistant Director
Bureau of Environmental Sanitation
New York State Department of Health
Albany 11, New York

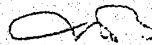
Dear Mr. Barker:

The references in your letter of September 27th to the Manufacturing Chemists Association and the Chemical Specialties Manufacturers Association led me to refer it to Dr. A. G. Cranch, who is active in the labeling work of both these groups. The fact that I have only now received his response, of which a copy is herewith, accounts for this delayed acknowledgment on my part.

The New York City Health Department has indicated approval of the labels submitted with my letter of September 21st and I gather from what you have said that they will be acceptable to your Department also.

As some of our member companies are only now learning of these new regulations, I assume that they will have a reasonable period in which to make proper compliance.

Sincerely yours,



MB:ES

C.c.c.: Mr. Whitford
Mr. Henrich
Mr. Whitson
Mr. Eichman

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