

MINUTES OF MEETING

SAFETY AND FIRE PROTECTION COMMITTEE

Embassy Row Hotel, Washington, D. C. March 7, 1972

PRESENT

Stanford Schreiber, Chairman
 John Jorgensen, Vice Chairman
 C. Breckenridge (for J. S. Queener)
 E. Cain
 H. Christian
 L. Dowell
 L. Gorbell
 M. MacCutcheon
 J. Pistek (for J. E. Gillan)
 S. Snyder
 C. Sommer
 F. Spence
 J. Walker
 S. Wood
 G. Stephenson, Secretary

Allied Chemical Corporation
 Rohm and Haas Company
 E. I. du Pont de Nemours & Company
 Hercules Incorporated
 FMC Corporation
 B. F. Goodrich Chemical Company
 Monsanto Company
 The Dow Chemical Company
 ICI America Inc.
 Merck & Co, Inc.
 Esso Research & Engineering Company
 American Cyanamid Company
 Union Carbide Corporation
 Sun Oil Company
 Manufacturing Chemists Association

GUESTS

L. L. Foster
 B. Howard
 S. Lane, M. D.
 Y. LeVine
 M. Pardee
 A. Rust
 E. Sourwine
 E. Woodworth

Union Carbide Corporation
 Shell Chemical Company
 Union Carbide Corporation
 Olin Corporation
 Eastman Kodak Company
 General Electric Company
 PPG Industries, Inc.
 National Fire Protection Association

Chairman S. Schreiber opened the meeting at 9:00 A.M.

1. Minutes of the December 14, 1971 meeting were approved as distributed.
2. Industrial Injury Statistics

Copies of the report for the fourth quarter of 1971, together with the annual supplementary report were distributed.

The injury frequency rate for 1971 for 112 participating companies was 3.55 compared to 3.85 for 1970. The severity rate for 1971 was 531 compared to 458 for 1970, reflecting an increase in deaths and permanent total disabilities from 68 to 73.

The editorial in the annual supplementary report reflected, in the opinion of some, tacit approval of corporate reorganization combining employee safety and health under the supervision of the medical department. The Secretary stated this was not intended and agreed to distribute a draft of any future editorial for full committee review prior to publication.

3. Safety Publications

I. Chemical Safety Data Sheets

- (a) Published since last meeting
SD-27 Phosphorus Trichloride
- (b) In printing stage
SD-56 Vinyl Chloride
SD-98 Allyl Chloride
SD-99 Isopropyl Alcohol
SD-51 Ethyl Acetate
- (c) Technical drafts on hand
SD-55 Butadiene
SD-16 Elemental Phosphorus
SD-28 Phosphoric Anhydride
- (d) In preparation
SD-43 Acetaldehyde (J. Pardee)
SD-57 Methylamines (J. J. Walker)
SD-6 Paraformaldehyde (H. J. Kolodner)
SD-41 Acetic Acid (J. Pardee)
SD-59 Propylene (J. J. Walker)
Xylene (W. S. Wood)
Ethyl Alcohol
Ethylene (J. J. Walker)

II. Chem-Card Manual

The thirteenth reprint (6,000 copies) of the Chem-Card Manual incorporates CC-86 Peracetic Acid and revised Chem-Cards for Vinyl Chloride and other compressed gases.

III. Guide for Safety in the Chemical Laboratory

Copies of the revised edition should be available in June 1972.

4. Occupational Safety and Health Regulations

Copies of minutes of the first meeting of the Inter-committee Task Group on OSHA Regulations held February 24, 1972 have been mailed to all members of participating committees.

The Safety and Fire Protection Committee's Task Group on OSHA Regulations under the Chairmanship of J. J. Walker has held two meetings, January 14 and March 6. OSHA Standards have been reviewed and a list of matters to be brought to the attention of OSHA is being compiled. All S&FPC members will have an opportunity to review the list which, additionally, will require approval of the Inter-committee Task Group before mailing to OSHA.

Phase I of the S&FPC review of the OSHA standards contains matters involving changes to or omissions from consensus standards.

Phase II will include consensus standards matters which, in the opinion of MCA, should be changed by the standards-making body.

Vote of Thanks

A vote of thanks was expressed to the task group concerned with the proposed amendment to Section 1910.106(d)(2)(iii) of OSHA regulations limiting the maximum allowable capacity of glass and of approved plastic containers of Class IA flammable liquids to 1 pint and of Class IB flammable liquids to 1 quart.

The MCA suggested wording for a footnote to Table H-12 as contained in Mr. Driver's letter of December 16, 1971 to the Assistant Secretary of Labor for OSHA, was as follows:

"Class IA and IB flammable liquids may be stored in glass containers of not more than 1 gallon capacity if the required liquid purity (such as ACS analytical grade or higher) would be destroyed by metal containers or if the liquid would cause excessive corrosion of the metal container."

MCA also verbally requested an exclusion for flammable liquids packaged for export.

The Federal Register of February 23 proposed the following amendment:

(iii) Size. Flammable and combustible liquids packaged for sale or use shall conform to Table H-12, except that glass or approved plastic containers of no more than 1 gallon capacity may be used for a Class IA or IB flammable liquid if:

(a) Such liquid is of a reagent grade or higher and the liquid would be rendered unfit for its intended use by contact with metal; or

(b) Such liquid would corrode a metal container excessively, thereby creating a leakage hazard; or

(c) The containers are filled solely for direct export outside the United States.

It was generally agreed that this possible outcome of the request for modification of the standard is very satisfactory since authority to use gallon-size containers is the prime objective of MCA's appeal. However, certain companies have traditionally packaged certain Class II flammable liquids in 5 and 6½ gallon carboys -- therefore a task group of representatives of the Chemical Packaging Committee and the Safety and Fire Protection Committee will meet on March 16 to discuss the possibility of requesting further relief. Some fears were expressed that a request for authorization to store flammable liquids in such large containers could not be justified from a safety viewpoint and might lead to loss of the relief obtained in the February 23 proposal for amendment.

Electrical Code

OSHA has adopted the 1971 revision of the National Electrical Code of NFPA. The committee discussed matters arising out of the immediate applicability of portions of the code.

Warranty of Conformity with OSHA

The committee discussed the fact that certain companies are requesting vendors to provide a warranty that the commodity purchased is in conformity with OSHA safety standards. While there was general agreement that companies should not sign warranties covering the overall OSHA standards, some companies believe it reasonable to request a warranty covering specific safety standards, e.g., guards on a machine.

5. Phosgene

Mr. R. L. Foster of Union Carbide Corporation and Mr. R. A. Rust of General Electric Company presented a recommendation from a group of phosgene manufacturing company members of MCA that a task group be appointed within the Association to study the hazards of phosgene, treatment of phosgene exposures, methods of spill control etc. Interested companies include BASF Wyandotte, Chemetron, Upjohn, Ott, Rubicon, UCC, Olin, Stauffer, Allied, GE, Mobay, Kaiser and PPG.

The committee unanimously resolved that a safety/health study of this nature is a proper activity for the Association and resolved to recommend that a task group be created under either the S&FPC or the OHC. It was the general opinion that the interest lies more in the occupational health area than safety, but that it should be a staff decision as to the placing of the proposed task group.

6. External Activities

National Fire Protection Association

(a) Classification of flammable liquids

Mr. Woodworth drew attention to the anticipated DOT classification of flammable liquids. Flammable-- up to 100° Tag. closed cup. Combustible -- 100° - 200°.

Mr. Sommer proposed a motion that the S&FPC support the concept that 100° (ignoring measurement technique) be the break point between flammable and combustible liquids. The motion was carried with Messrs. Schreiber and Cain voting negatively.

Mr. Woodworth drew attention to the increasing adoption of the SETA flash point tester.

(b) OSHA standards - "Shalls" and "Shoulds"

Mr. Woodworth advised that NFPA has been asked to rewrite its standards separating the "shall" sections from the advisory "should" sections. This would enable OSHA to adopt only the "shall" sections for use in compulsory standards.

(c) NFPA 30 Flammable and Combustible Liquids Code - Section 2173

Mr. Schreiber discussed the section on "Diked Areas" and agreed to write a proposed amendment to this section. The revised code will be submitted for adoption at the NFPA Annual Meeting in May 1972.

Mr. Schreiber's proposal for amendment of Section 2173 will be forwarded to F. G. Stephenson who will submit it to the S&FPC for approval by letter ballot. If approved, Mr. Schreiber will propose this amendment from the floor at the NFPA Annual Meeting.

Mr. Sommer pointed out that the revised Code 30 will cover all materials which have flash points. The upper limit in the current edition is 200°F.

(d) NFPA 10 Fire Extinguishers

Mr. Sommer drew attention to a proposed change in this standard which, in certain hazard areas, will require placement of fire extinguisher equipment every 30 ft. in lieu of 50 ft. as presently required. Mr. Sommer plans to oppose this change from the floor at the NFPA Annual Meeting.

(e) Review of Revised NFPA Standards

All members of the S&FPC were asked to review standards published in the advance notice for the NFPA Annual Meeting and to note any unsatisfactory sections. The secretary was asked also to contact the MCA representatives to the various NFPA committees whose new standards are scheduled for adoption at the Annual Meeting, and invite them to advise the S&FPC regarding undesirable aspects of the proposed standards.

Copies of NFPA 30 and NFPA 10 will be distributed to committee members.

(f) MCA Representatives at 1972 Annual Meeting of NFPA

The following were appointed:

S. Schreiber
A. H. Christian
S. M. MacCutcheon
S. F. Spence
W. S. Wood
F. G. Stephenson

7. Membership

The resignation of Mr. Gordon Jamieson of CIL was announced. The committee adopted a unanimous vote of thanks to Mr. Jamieson for his services.

Change in Committee "Terms of Reference" - March 1967

It was unanimously voted to propose to the Board of Directors a change in the March 1967 "Terms of Reference" as follows:

Change "The membership of the Safety and Fire Protection Committee (hereafter referred to as the Central Committee) shall be limited to 18 members" to read "....shall be limited to about 18 members".

Subject to Board of Directors' approval of the above change, the Committee unanimously proposed appointment of the following two applicants, making the total membership 19 at this time - viz,

Dr. R. Y. LeVine - Olin Chemical Corporation
Mr. R. B. Howard - Shell Chemical Company

8. Appointment of officers for two-year period commencing July 1, 1972

On the recommendation of the nominating task group, the following were unanimously appointed:

Chairman - Mr. J. Jorgensen, Rohm and Haas Company
Vice Chairman - Mr. J. J. Walker, Union Carbide Corporation

9. Visit to United Kingdom - June 12-16, 1972

Copies of the proposed itinerary have been mailed to all members of the S&FPC and OHC. The visiting group will meet with representatives of H.M. Chemical Industry Inspectorate on Monday, June 12; will visit chemical plants in the Teesside area June 13-15; and meet with the combined Safety and Medical Committees of the Chemical Industries Association on June 16.

10. Chemical Industry Safety and Health Workshop

It was agreed to hold the workshop on September 26, 1972 and not in May as previously arranged. Messrs. Jorgensen and Cain agreed to recommend suitable accommodations for the workshop.

11. Miscellaneous

(a) Procedure for Handling Large Spills of Hydrofluoric Acid

Mr. Walker reported that a final draft is in preparation and will be forwarded to the secretary. Arrangements will be made either to print the document as a separate MCA publication or to include it as an addendum to Chemical Safety Data Sheet SD-25.

(b) Case Histories of OSHA Inspections

It was agreed to add this item to the agenda for future meetings.

12. Meetings

- (a) The next S&FPC meeting will be held in the Conference Room, MCA offices, Washington, D. C. on May 24, 1972 commencing at 9:00 A.M.
- (b) The Task Group on OSHA Regulations will meet in Washington on May 23 commencing at 10:00 A.M.
- (c) A S&FPC meeting will be held on September 27 (same hotel as for workshop - to be arranged).

Minutes subject to approval
FGS:ckm
3/15/72