

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



Reply to the Attention of:

DEC 16 1996

Mr. George R. Fuchs
Manager - Environmental Affairs
National Association of Printing Ink Manufacturers
777 Terrace Avenue
Hasbrouck Heights, NJ 07604

Dear George:

This is in response to your association's request for assistance in resolving the issue of assessing the information to be included on a material safety data sheet. Your association's particular situation is for a printing ink mixture containing carbon black which has been evaluated by IARC as "not classifiable as to their carcinogenicity to humans (Group 3)" while the designation for carbon black has been re-evaluated as "possibly carcinogenic to humans (Group 2B)."

After discussions of the issue with Jennifer Silk, project officer for the Hazard Communication Standard (HCS) at the time of its promulgation, and Tom Galassi, of the Directorate of Compliance Programming, it was concluded that the proper designation for use in hazard determination was that obtained for printing inks evaluated as mixtures. The HCS requires that, when mixtures have been tested as a whole, the results of such testing shall be used to determine whether the mixture is hazardous. Furthermore, in the case of the printing inks, the carbon black is not present in such a form so as to present an exposure problem for employees.

This affirms your understanding of the HCS as it relates to the issue presented in your memorandum.

Thank you for your patience. Please accept my apology for the delay in this response.

Sincerely,

Thomas A. Towers
Industrial Hygienist