



July 30, 1996

Thomas Towers  
Occupational Safety and Health Administration  
200 Constitution Avenue NW  
Room No. 3718  
Washington, DC 20210

National Association of Printing  
Ink Manufacturers  
777 Terrace Avenue  
Hasbrouck Heights, NJ 07604

Ref. Material Safety Data Sheet (MSDS) Information Requirements for Printing Ink Mixtures Containing Carbon Black

Dear Thomas;

It was a pleasure speaking with you yesterday regarding the referenced issue. According to our conversation the following issue is being submitted for review and consideration of the applicable Hazard Communication Standard (HCS) requirements.

#### NAPIM

The National Association of Printing Ink Manufacturers (NAPIM) is a national trade association representing small, medium and large ink manufacturers in the U.S. Its 87 members account for almost 90% of the total U.S. sales of printing ink. Through this memorandum NAPIM would like to confirm our understanding of the application of the Hazard Communication Standard (HCS) requirements with respect to the following issue.

#### ISSUE

The International Agency For Research on Cancer (IARC) Monograph Volume 65 Printing Processes and Printing Inks, Carbon Black and Some Nitro Compounds, issued in April of 1996, re-evaluates carbon black as "*possibly carcinogenic to humans (Group 2B)*" from its previous IARC evaluation of Group 3. This monograph also evaluates printing inks retaining its previous evaluation as "*not classifiable as to their carcinogenicity to humans (Group 3)*".

Given the HCS preference for the use of health hazard data on mixtures over health hazard data on individual mixture components [29 CFR 1910.1200(g)(2)(i)(B)], it is our interpretation that when assessing the information to be included on a material safety data sheet for a printing ink mixture containing dispersed carbon black that the IARC evaluation covering printing inks (Group 3) would take precedence over the IARC evaluation of carbon black (Group 2B).

Your timely consideration and response this issue would be greatly appreciated. In addition, in an effort to document the submission of this issue to OSHA and your intention to consider and respond to this issue, NAPIM respectfully requests that you initial this sheet as indicated below and return it to us at the NAPIM office as soon as possible.

If you have any questions related to this issue please contact me at the NAPIM office at 201/288-9454.

Sincerely,

George R. Fuchs  
Manager - Environmental Affairs

Received by: \_\_\_\_\_ representing OSHA on \_\_\_\_\_.  
Thomas Towers Date