

LOG: JCL: MMG: RF

XF: LCCAB

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VISTA

To KATH Fogg

Date 8/5

Per your request!

see pp. 4 and A6
of the OSHA Compliance
Document for HAZARD
Determination procedure.

TGS

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HAZARD DETERMINATION PROCEDURE

1. Inventory all chemicals shipped into and out of your plant. This should include the following:
 - a. Conoco Chemicals commercial products
 - b. Process additives, catalyst, etc.
 - c. Maintenance materials and solvents
 - d. Laboratory chemicals received in bulk quantities (5 gallon containers and up).
2. Compare the plant inventory to the OSHA "floor" list of hazardous materials. These are materials found in the following references:
 - a. OSHA Z Tables and 21 substance specific standards
 - b. 1983-84 ACGIH TLV List
 - c. NTP Annual Report (latest addition)
 - d. IARC Monographs
3. All of the materials on the plant inventory which appear on (a)-(d) above are considered hazardous. A MSDS must be obtained for them.
 - a. MSDSs already in-plant should be reviewed for content and accuracy.
 - b. MSDSs found deficient in content should be upgraded. Requesting an up-to-date MSDS from the supplier would be the simplest first step.

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4. For materials on your plant inventory that are not on the sources listed in 2(a)-(d), a hazard determination must be done. To accomplish this two options are available.
 - a. Depend on manufacturers hazard determination. This is most simply done if a MSDS is available for review.
 - b. Review standard sources (listed in Appendix C of the Standard) or do literature searches.
5. MSDSs must be obtained or produced for all materials determined hazardous in Step 4.
6. Develop inventory listing of hazardous materials in-plant.

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LAB HAZ. MAT. LIST

Acetone

Benzene

Chlorine

NaClO - 7348 8300 7384 7383

Compressed Gases

H₂S

HF ACID

LIME

Pacol Catalyst

Paraffins (C₁₀₋₁₁)

Potassium Hydroxide

SODA ASH

Sulfuric Acid

Therminol

The master list sent out in July 1 memo from me will show you what MSDS's you may have to produce. LAB is plant no. 1 on the list.

The above is based on a review of a plant chemical inventory. I don't have the full inventory list.