

BFG RESTRICTED

OSHA PRESCRIBED
LABELING PROCEDURE
FOR
VCM, GEON RESINS, COMPOUNDS & LATEX
REVISED DATE SEPTEMBER 15, 1975

B.F. Goodrich Chemical Co.
Warehousing & Packaging Dept.
September 1, 1975

NGC36225

Since April 1, 1975, we have been using OSHA prescribed markings on VCM and PVC. Our procedures have followed guidelines suggested by SPI; they have been approved by our management and legal groups. Labeling procedures have been written with the prime objective being to inform the worker of a potential hazard. They are designed to meet with good operating practices. Several revisions have now been made to the original procedures, issued on March 15, 1975. This new issue will update these labeling changes.

The plant Shipping Departments have the responsibility of assuring that all packaged goods are neatly labeled prior to shipment. The plant Production Departments are responsible for the labeling of containers and vehicles, at the time of filling. Effective September 15, 1975 each container (primary package) of applicable products, must be marked at the time of filling. Also, after September 15, 1975 each container (primary package) of applicable products, must be neatly marked prior to shipment from any BFGCC shipping location (plant, distribution center or public warehouse).

All tags and labels outlined in the following procedures shall be neatly applied to the packages or vehicles.

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GENERAL LABELING REQUIREMENTS & EXCEPTIONS

Export shipments of PVC resins or compounds will not normally be made if the product contains more than 10 ppm Residual Vinyl Chloride Monomer (RVCM). Packaged Geon resins and compounds meeting the above requirements and prepared for export shipment shall not be labeled. Materials containing higher RVCM levels than stated above can be shipped export only on the approval of the Administrative Director, International Department; each container of these materials, although approved as stated above, must then be labeled with the required OSHA statement. Pallet loads, not requiring the OSHA labels, will be stenciled "For Export" on all four (4) sides of the top and bottom corrugated trays. If an export overwrap (Package Code 14) is required, stencil the words "For Export" on all four sides of the overwrap in the upper righthand corner. When individual bags are shipped, stencil the words "For Export" on each bag. Do not label or tag "Export" shipments of Geon latex packaged in drums. Stencil the words "For Export" on the side-wall of the drum near the top.

All products marked "For Export" shall be stored in segregated areas of warehouses. Appropriate signs shall be placed in these areas indicating that the material has been prepared for export; the signs will also display the OSHA warning label.

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GENERAL LABELING REQUIREMENTS & EXCEPTIONS (continued)

Do not label or tag bulk "Export" shipments of Geon latex, resin or compounds. Affix a tag or label with the words "For Export" on each inlet and outlet of the bulk vehicle. An exception is Pacific Plastics, Vancouver, British Columbia; they have agreed to accept bulk hopper cars with the OSHA statement required for domestic shipments. This procedure will be used for this customer only until the producing plant is able to ship product consistently below the 10 ppm level.

Shipments to Hawaii, Alaska and Puerto Rico shall be treated as "domestic" shipments.

Armstrong Cork shipments of all PVC products, including dispersion resins, require the OSHA label on each package received at their plants. There may be other exceptions to our marking procedures; these changes will be indicated on each particular customer code.

The following products should not be labeled, except as noted above:

1. Hi-temp Geon compound or resin packages or bulk vehicles.
2. Polyblend packages including Geon Polyblend 8720, or Hycar 1432.
3. Dispersion resins will not be labeled; they will not be shipped from our plants or local plant area distribution centers until the RVCM level is at or

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GENERAL LABELING REQUIREMENTS & EXCEPTIONS (continued)

below one (1) ppm. All dispersion resins above one (1) ppm will be considered as in process materials. Any of these materials over one (1) ppm shipped from our plants will be considered as off-spec and must have the normal marketing approvals for this grade prior to shipment. Shipments of these off-grade materials must include the prescribed OSHA levels.

4. Geon Latexes 660X1, 660X2 and 660X4. These latexes do not contain vinyl chloride.

The following "exception" products should be labeled:

1. Hycar Acrylic Latex 2600X189 should be labeled according to procedure covering Geon latexes. This is the only Hycar latex that will require the OSHA label.
2. The following products have been classified as Flexible Geon Compounds and should be labeled: 8880-021, 8880-288 and 8878-288.

VCM RAIL CARS

All VCM tank cars must include the diamond shaped hazardous materials placard with the words "Cancer Suspect Agent" inserted in 1/2" high letters under the "Vinyl Chloride" designation. "Vinyl Chloride" will be in 3/4" letters.

A placard will be placed in each bracket, provided for this purpose, on the car. There are four (4) brackets per car, one on each side and one on each end.

Calvert City has arranged for a supply of placards meeting the above outlined standards.

GEON LATEX TANK TRUCK

A supply of tags (BFG 16590) has been furnished to all Geon latex producing plants. These tags are approximately 4" X 7-1/2". They contain the required OSHA and a Company suggested statement. These tags should be used, at inlet and outlet points on trailers containing designated Geon latexes, as described below, until our initial supply is depleted.

After this supply of form BFG 16590 tags has been exhausted, all tank trucks containing these latexes shall include a revised single trip service tag (approximately 3" X 5") (BFG 16590A). These tags shall state:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement shall be printed on both sides of the tag. Tags are supplied with eyelets and wire ties attached.

One tag shall be tied to each loading hatch and to the end of each discharge outlet.

Future requirements for these tags (BFG 16590A) can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

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BULK HOPPER CARS

All bulk hopper cars containing designated Geon resins or compounds will be labeled:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required OSHA statement is in 3/8" high letters. The labels are a permanent, pressure sensitive type, approximately 3" X 5". They are white with black lettering.

A permanent label must be affixed at each inlet and each outlet. One should be placed in the center of each top manway hatch, on the outside of the cover. A label should also be affixed to the slope sheet of the discharge hopper, directly behind each unloading tube cap. All labels should be neatly and securely applied to cleaned surfaces.

A supply of these labels (BFG 16611) has been furnished Geon resin and compound producing plants by the Warehousing & Packaging Department. Future requirements can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

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GEON LATEX CARS

A supply of tags (BFG 16590) has been furnished to all Geon latex producing plants. These tags are approximately 4" X 7-1/2". They contain the required OSHA and a Company suggested statement. These tags should be used at inlet and outlet points on cars containing designated latexes, as described below, until our initial supply is depleted.

After our supply of form BFG 16590 tags has been exhausted, we will use a revised version of this single trip service tag (approximately 3" X 5") (BFG 16590A) for marking inlets and outlets of specified Geon and certain Hycar latex cars. All rail cars containing these latexes will then be tagged:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement is printed on both sides of the tag. Tags are supplied with eyelets and wire ties attached.

A tag shall be tied to the hatch cover and to bottom outlets, where applicable.

Future requirements for these tags (BFG 16590A) can be ordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

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GEON RESIN & COMPOUND BULK TRUCKS

A supply of tags (BFG 16590) has been furnished to all resin and compound producing plants. These tags are approximately 4" X 7-1/2". They contain the required OSHA and a Company suggested statement. These tags should be used at inlet and outlet points on all resin and compound bulk truck shipments as described below, until our initial supply is depleted.

After our initial supply of form BFG 16590 tags has been exhausted, we will use a revised version of this single trip service tag (approximately 3" X 5") (BFG 16590A) for marking inlets and outlets of specified resin and compound bulk trucks. These tags will read:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement is printed on both sides of the tag. The tags are supplied with eyelets and wire ties attached.

A tag shall be tied to the exterior of each top loading port and/or manway. One shall also be attached at the end (discharge point) of each trailer unloading line(s).

Future requirements for these tags (BFG 16590A) can be ordered by using a Forms Requisition. This requisition should be sent to the Cleveland Forms Group.

GEON RESINS AND COMPOUNDS IN BAGS

Due to the fact that some of our PVC producing units will have inventories of bags without the required OSHA labeling, after September 15, 1975, it will be necessary to label (or stamp) each bag, prior to filling or shipment (in the case of filled bags), containing designated products. The following label (or stamp) will be used on each bag:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All label printing is in BFG red on kraft colored pressure sensitive label stock. Any packages shipped individually, as non-unitized loads, must have one of the above specified labels affixed to each individual container. Hand stamps, containing the required OSHA statement in 1/4" high letters, will be supplied to the PVC producing plants by the Warehousing & Packaging group. Hand stamping ink will be black. These hand stamps may be used as an alternate to labels until preprinted bags are available. Stamping should be done, in a clear area, on the bottom end of each bag where the product and lot identification is located.

An initial supply of labels (BFG 16591A) has been supplied to the PVC producing plants by the Warehousing & Packaging Department. Future requirements can be reordered by

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GEON RESINS AND COMPOUNDS IN BAGS (continued)

using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

Bags received after April 15, 1975 are printed with the prescribed statement:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The above statement is located in the gussets, to the right of a Geon Vinyls logo. This printing is located on the back of the bag in 1/8" (min.) high letters. This statement is located above the Non-Warranty Statement. All printing is in BFG red, the same color as other printing on the bags. Bags preprinted with these statements are designated as BFG print layout No. 2.

The Warehousing & Packaging group has coordinated these printing changes with bag suppliers.

GEON RESINS AND COMPOUNDS IN (CT-200) BULK BOXES

One label (BFG 16591A) should be placed on each large side panel (2 labels/box) to the left of the Geon Vinyls elliptical logo on specified Geon products. The following label is to be applied to these boxes:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All printing is in BFG red on kraft colored, pressure sensitive label stock.

An initial supply of these labels (BFG 16591A) has been supplied to the PVC producing plants by the Warehousing & Packaging Department. Future requirements can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

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LATEX DRUMS

Specified Geon and Hycar latexes packaged in LQP-19 or LQP-20 fibre drums or in DR-7 or DR-8 steel drums will have pressure sensitive labels (BFG 16529A) applied containing the OSHA statement. The OSHA statement will read:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All printing is in BFG blue on kraft colored, pressure sensitive label stock.

A label should be squarely and securely affixed to the sidewall of the drum in the area of the standard printing included on each drum. Printing on the drum should not be obstructed by this label. One label per drum is required. All applicable drums filled after April 1, 1975 should be labeled at the time they are loaded. No applicable drums should be shipped after September 15, 1975 without the OSHA label.

An initial supply of these labels (BFG 16529A) has been supplied to the Geon (and certain Hycar) latex producing plants by the Warehousing & Packaging Department. Future requirements can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

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MISCELLANEOUS PACKAGES & SAMPLES

We occasionally package small volumes of Geon resins, or compounds in special bags, boxes, fibre drums, etc. These containers frequently contain no Company identification. Each of these packages must be labeled:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required OSHA statement is in 1/4" high letters. This pressure sensitive label will normally be in BFG red (BFG 16591A) on kraft colored label stock; a kraft colored label with BFG blue printing (BFG 16529A) may be used if the prime container Company identification is blue.

A label shall be neatly applied to each container.

An initial supply of these labels has been supplied to the plants by the Warehousing & Packaging Department. Future requirements can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

PVC resins, compounds and latexes are frequently distributed in sample (less than standard package) quantities. The inside containers must also be marked to comply with OSHA regulations. If containers are large enough, labels as specified

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MISCELLANEOUS PACKAGES & SAMPLES (continued)

above, should be used. For small sample containers attach a tag (BFG 16590A) as specified under the "Geon Latex Tank Trucks," and "Geon Resin & Compound Bulk Trucks" sections of these procedures.

Since the purpose of the regulation is to inform the person opening the container of a possible hazard, all sample containers should be placed in an "overwrap" package. We recommend that the outer package not contain the OSHA statement.

VCM sample containers shall be labeled or stenciled with the wording "Cancer-Suspect Agent." This lettering shall be 1/2" high. It should be located in the area of the 3" X 3" DOT Hazardous Materials "Flammable Gas" label affixed to each VCM container.