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TO: Distribution

FROM: Tom Grumbles

DATE: May 31, 1985

Interoffice
Communication

SUBJ: VISTA PRODUCT DRUM LABELING

VISTA

Below is a preliminary list of products which must be labeled to assure compliance with the OSHA Hazard Communication Standard.

ALFOL 6	ALFONIC 610-60	Muriatic Acid	
ALFOL 8	ALFONIC 810-40	C-550 Slurry	1412-60 ether solvent
ALFOL 8 HP	ALFONIC 1012-40	C-560 Slurry	
ALFOL 10	ALFONIC 1012-60	C-640 Slurry	
ALFOL 12	ALFONIC 1214 GC-30	VCM-100	
ALFOL 14	ALFONIC 1214-70	ALFONIC 1412-A	
ALFOL 610	ALFONIC 1214 HA-30	ALFONIC 1412-S	
ALFOL 810	ALFONIC 1214 GC040	Aqueous Aluminum Chloride	
ALFOL 1012HA	ALFONIC 1216-22	LPA	
ALFOL 1014 CDC	ALFONIC 1216-30	ODC	
ALFOL 1214	ALFONIC 1218-70	MR SOLVENT	
ALFOL 1216	ALFONIC 1412-40	C ₁₀₁₁ Paraffins	
ALFOL 1412	ALFONIC 1412-60	C ₁₀₁₂ Paraffins	
ALFOL 1416	ALFONIC 1412-70	C ₁₀₁₆ Paraffins	
ALFOL 1418	SA-597	C ₁₁₁₃ Paraffins	
ALFONIC 610-50	SA-697	C ₁₄₁₆ Paraffins	

To comply with the standard, the label must contain the following:

1. Identity of the hazardous material
2. Appropriate hazard warning
3. Name and address of the chemical manufacturer or responsible party.

Based on discussion with Legal, we should assure compliance with the standard as well as have a label which serves to meet known product liability concerns. To do this, I have chosen to utilize the AMERICAN NATIONAL STANDARDS INSTITUTE'S (ANSI) recommended labeling scheme. The recommended "appropriate hazard warning" portions of the required labels for each listed product are attached. The label design and logistics will have to be decided soon to assure timely printing of the labels by the November compliance date.

Also, to meet product liability concerns all drums must have an empty drum hazard warning label on them. After considering the options for this, I recommend the label which is available from label master. (attached).

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This initial listing is based on currently drummed products and products that could potentially be drummed by us or toll processors. Any other material leaving our plants in a drum will have to be evaluated for label requirements. I will follow-up on this memo to arrange necessary meetings, etc. for matters that must be decided in the near future.



Thomas G. Grumbles

ajo/007

Attachments

Distribution:

R. R. Cooley
J. A. DeBernardi
G. G. Draper
H. W. Hilgers
R. M. Lamons
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VEV-149307