CHEMICAL SPECIALTIES MANUFACTURERS ASSOCIATION

Founded 1914

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August 25, 1981

TO: CSMA Membership

FROM: Ralph Engel
President

RE: Hazardous Materials Identification System

This past January, the Occupational Safety and Health Administration (OSHA) published an extremely important proposal addressing chemical hazard identification. CSMA strongly opposed the drastic approach taken, and in February the Reagan administration rescinded the proposed rule.

In response to pressure from labor unions and some members of the chemical industry, OSHA created a task force to develop a substitute rule. OSHA plans to publish a proposed regulation in the near future. We have established a task force to help formulate a CSMA position as the issue develops, and member companies should be prepared to advise us of their views on this highly significant matter.

In the meantime, there have been discussions between chemical suppliers and downstream users as to how the chemical industry as a whole should communicate hazard information. Many suppliers are concerned that an OSHA performance standard would lead to a variety of responses from suppliers, frustrating any uniform system of rating hazards. These ratings would appear on the material safety data sheet or equivalent document, and would be most helpful to suppliers if they are universally accepted.

There have also been discussions among processors, who appreciate the suppliers' concern and see the advantage of having a uniform system. The National Paint & Coatings Association (NPCA) has developed a Hazardous Materials Identification System (HMIS), which includes the enclosed rating scales for hazards related to health, flammability, and reactivity.

The central concept of HMIS is to create labels for these three hazards, using a five-tiered scale for each hazard, and designating the proper personal protective equipment, so that an

employee will be able to handle the chemical substances he deals with safely. The system is color-coded to communicate the relative degree of hazard, so that a label will show the health hazard rating on a blue background, the flammability hazard rating on a red background, and the reactivity hazard rating on a yellow background. Symbols or letter designations on a white background will show what protective equipment the worker should use.

Since NPCA has asked other groups of processors to endorse HMIS, this memorandum seeks to solicit opinions from CSMA member companies with regard to the HMIS system in particular, and the idea of a uniform rating system for hazard communication in general. Please fill out the enclosed survey and return to CSMA as soon as possible.

RE/kms

Enclosures

TG Rader

Survey on HMIS

My company's position with regard to NPCA's HMIS system can best be described as follows:

_____ Supports the HMIS hazard rating scales

__X__ Supports the concept of a uniform hazard rating system for the chemical industry, but not necessarily HMIS

_____ Opposes the HMIS hazard rating scales

_____ Opposes the concept of a uniform rating system for the chemical industry

_____ No established position

_____ Other (Please explain)

Please submit any other comments you have on HMIS

Upon completion, please send this survey to CSMA at 1001 Connecticut Avenue, N.W., Suite 1120, Washington, D.C. 20036

Attention: HMIS Survey

Thomas A Tubbs
Individual Completing the Form

Pfizer Chemicals
Company

TABLE 1

HEALTH HAZARD RATING CHART

0	MINIMAL HAZARD	no significant risk to health
1	SLIGHT HAZARD	irritation or minor reversible injury possible
2	MODERATE HAZARD	temporary or minor injury may occur
3	SERIOUS HAZARD	major injury likely unless prompt action is taken and medical treatment is given
4	SEVERE HAZARD	life threatening major or permanent damage may result from single or repeated exposures

FLAMMABILITY HAZARD RATING CHART

0	MINIMAL HAZARD	materials which are normally stable and will not burn unless heated
1	SLIGHT HAZARD	materials that must be preheated before ignition will occur. Flammable liquids in this category will have flash points (the lowest temperature at which ignition will occur) at or above 200°F (NFPA) Class II and Class III A)
2	MODERATE HAZARD	material which must be moderately heated before ignition will occur, including flammable liquids with flash points at or above 100°F and below 200°F. (NFPA) Class III B)
3	SERIOUS HAZARD	materials capable of ignition under almost all normal temperature conditions, including flammable liquids with flash points below 73°F and boiling points above 100°F as well as liquids with flash points between 73°F (NFPA Classes IB and IC)
4	SEVERE HAZARD	very flammable gases or very volatile flammable liquids with flash points below 73°F and boiling points below 100°F (NFPA Class IA)

REACTIVITY HAZARD RATING CHART

0	MINIMAL HAZARD	materials which are normally stable, even under fire conditions, and which will not react with water.
1	SLIGHT HAZARD	materials which are normally stable, but can become unstable at high temperatures and pressures. These materials may react with water, but will not release energy violently.
2	MODERATE HAZARD	materials which in themselves are normally stable and will readily undergo violent chemical change, but will not detonate. These materials may also react violently with water.
3	SERIOUS HAZARD	materials which are capable of detonation or explosive reaction, but require a strong initiating source, or must be heated under confinement before initiation, or materials which react explosively with water.
4	SEVERE HAZARD	these materials are readily capable of detonation or explosive decomposition at normal temperatures and pressures.