



DATE: 10/1/84 TGG: GP
XF: 125144 Labeling

Interoffice Communication

TO: Safety Directors

FROM: T. G. Grumbles

DATE: July 17, 1984

SUBJ: HAZARD COMMUNICATION STANDARD ACTION ITEMS

Below are the basic steps that must be taken to comply with the subject standard. As we discussed at the IH meeting, we all should begin working toward compliance to avoid last minute problems in 1985 and 1986.

1. Do the in-plant hazard determination and develop inventory list of hazardous materials (covered in separate letter).
2. Determine additional training needs and develop programs as needed.

As discussed, we should develop generic topic programs where possible. Content of the programs is specified in the Standard.

3. Develop methods to inform contractors of hazardous materials in their work areas.

This is a "performance" requirement and any effective method can be used.

4. Assure purchasing practices in-plant include obtaining MSDSs for all hazardous materials.

In order to avoid decision making by purchasing as to what is hazardous, I would recommend an "approved list" be developed from your initial hazard determination effort, and your policy state a MSDS be requested for all materials not on that list. A draft letter of request is enclosed. This letter would assure documentation of non-hazardous materials. As discussed the approved list would avoid requesting a MSDS every time a material is purchased but would force us to depend on manufacturers to send us updated MSDSs.

5. Determine in-plant labeling and sign-posting requirements.

Container labels in-plant (tanks, vessels, etc.) should list the content of the container and appropriate hazard warning. In the case of mixtures, particularly complex mixtures, a generic description can be used if that material is described elsewhere (i.e., the nearest control room) in a MSDS or other similar material with the same name. The hazard warning would be the most relevant one for anticipated exposures (i.e., flammable, inhalation hazard, carcinogen).

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Product shipments from the plant should be reviewed. As we currently understand the regulation, bulk shipments need only have the required DOT markings. Any drummed or other similarly packaged materials should have the proper label. This includes samples.

6. Determine in-plant MSDS distribution.

These must be readily available at all times for employees in work areas where hazardous materials are present.

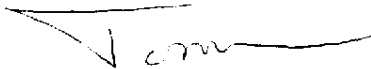
7. Assure a method exists to inform employees of the hazards of non-routine tasks.

This includes maintenance operations, emergency response, etc. Our current work permit system may meet this requirement or could be expanded to do so.

8. As required in the standard, document all of the above in a written hazard communication program.

This must include items specified in the standard. I plan to develop an outline to be used in developing this program.

I'm sure all of the above items will be discussed a great deal in the next 12 months. Based on current plant programs, some of the required items do exist but will have to be formalized as part of the overall hazard communication program. Please review the items listed. Eventually we should decide on a schedule for the above to assure they are accomplished by the compliance dates.



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