



TO Distribution

DATE January 9, 1985

FROM Ron Williams *RW*SUBJECT Hazard Communication
Task Force

During the past few weeks I have talked with each of you about your participation on a "Task Force" directed at achieving compliance with the OSHA Hazard Communication regulation. A copy of the regulation and PPG Chemicals' Hazard Communication Compliance Program are attached for your review.

The week of January 21, 1985, I would like to convene the Task Force to address some of the issues relevant to achieving compliance. A tentative date for the meeting is January 25 which will coincide with a plant visit by J. C. Delgado of G.O. Environmental Affairs. I will provide a firm meeting date, time, and location as soon as practical.

Although there are many individual requirements of the regulation, I feel the Task Force should consider the following items during its initial meeting:

1. How are we to inform employees of hazardous materials present during non-routine tasks - 1910.1200(e)(1)(ii)?
2. How are we to inform contractors of hazardous materials and suggest appropriate protective equipment - 1910.1200(e)(2)(iii)?
3. Relabel purchased materials with inadequate labels.
4. Assure hazard information is readily accessible to affected employee concerning streams (mixtures) and intermediates - 1910.1200(g)(9).
5. How much of the required training peculiar to a particular unit is to be given in that unit - 1910.1200(h)(1)(ii) & (iii) and 1910.1200(h)(2)(i) & (iii)?
6. What materials are we going to exclude? The following is proposed:

Generally, Material Safety Data Sheets are not required for products: (1) purchased in small quantities (less than one quart containers), (2) have low toxicity (i.e. are widely used by the general public without special precautions) and (3) could have otherwise been purchased over-the-counter for household use. For example, MSDS are not required for most hand soaps, insect repellent, liquid paper and glass cleaner, but would be required for industrial cleaners, solvents, lubricants, etc.

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7. How are samples to be identified (i.e., what are the contents of the sample > 1% or 0.1% for carcinogens)?
8. Designation of Work Areas where MSDS's will be made available to employees - 1910.1200(g)(8).

pd

Attachments

Distribution:

B. Kelly
D. Mullett
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cc: (w/o attachments)

J. Shepherd
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A. J. Kubicek