

To: John Friend

From: K. L. Fogg
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Subject: OSHA 1200 - HAZARD COMMUNICATION PROGRAM

interoffice
communication

VISTA

I have reviewed the plant OSHA Hazard Communication Program. The results of that review are as follows:

1. Labeling of plant vessels and containers does not meet the requirements or intent of the standard.
2. Control of new chemicals on the site is not effective.
3. The training requirements for the standard have been met and are adequate.

In order for the plant program to meet the requirements of the regulation, I recommend the following:

1. Adopt the revised and attached plant Hazard Communication Program.
2. All vessels except piping systems and pumps must be labeled with the appropriate hazard warnings as per the regulation. This can be done by stenciling three letter codes on the vessel or container which would indicate the type of hazard(s) of the chemicals inside that vessel. A similar system is in use at the LCCC (see picture).
3. We need to have a method of identifying each container or vessel. This would be used to identify the individual chemicals in a vessel by referring to a master list in the plant Hazardous Materials Reference Book.
4. We need to adopt and enforce the provision in the program for purchasing or bringing "new" chemicals on site.

In summation, we still have alot of work to do to meet the requirements of OSHA 1200.

If you have any questions, please call me.



K. L. Fogg
Safety Director

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