LPA

TO: Distribution

FROM: T. G. Grumbles
DATE: July 7, 1986

Interoffice Communication

SUBJ: VISTA LPA HAZARD DETERMINATION

VISTA

As discussed at the last VALAMO meeting, the enclosed has been prepared for use when answering questions regarding the carcinogenic labeling requirements of the OSHA Hazard Communication Standard as they relate to LPA. The text can be used in a letter or as an attachment to Tech Data Sheets, but should be used in it's entirety. If LPA-200 changes to LPA-210 (or some other number) this change can be reflected in the text when used.

Thomas G. Grumbles

ajo/9

Enclosure

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# HAZARD DETERMINATION FOR VISTA LPA SOLVENTS

LPA Solvent is a hydrotreated, predominately napthenic hydrocarbon solvent. Based on our hazard determination, under OSHA's Hazard Communication Standard (29 CFR 1900.1200), LPA and LPA 140 present both a physical and a health hazard and LPA 200 presents a health hazard. Vista LPA Solvents do not require carcinogenic warning labels.

A chemical is considered a physical hazard if there is scientifically valid evidence that it is a combustible liquid, compressed gas, explosive, flammable liquid or solid, organic peroxide, oxidizer, pyrophoric, unstable (reactive), or water-reactive. LPA and LPA 140 Solvents are combustible liquids due to their flash points of less than 200°F. The flash point of LPA 200 exceeds 200°F and is not a physical hazard by definition.

A chemical presents a health hazard if one statistically significant study done in accordance with established scientific protocol indicates an effect may occur in exposed populations. Based on acute mammalian testing done on LPA; including dermal $LD_{50}$, primary skin irritation, primary eye irritation, inhalation $LC_{50}$ for 1 hour exposures, and oral $LD_{50}$, the LPA Solvents have been determined to be irritants.

LPA Solvents contains no OSHA defined carcinogens at levels greater than 0.1%. As for the broad categories of "mineral oils", petroleum oils, or other generic classifications of oils which have been indicated to have a carcinogenic potential by various studies we believe the following to be true in respect to LPA Solvents. IARC Monograph 33, a compilation of carcinogenic evidence for Mineral Oils (lubricant base oils and derived products) classifies the carcinogenicity of petroleum derived oils based on the increasing severity of processing or refinement. This monograph deals with oils that are predominately lubricant base oils with initial boiling points exceeding 750°F and having carbon number distributions of 15 to 50. The monograph also lists specific oils as defined by CAS numbers assigned by the U.S. EPA. LPA Solvent has an IBP of 370°F and has a carbon number distribution predominately in the $C_{12}$-$C_{16}$ range. Also the CAS number descriptive of Vista's LPA solvents is not listed in the monograph. Based on these facts, Monograph 33 does not contain evidence relevant to the LPA Solvents.

Of those oils discussed in the monograph, the LPA Solvents are closest to the white oil (Class 5) classification, for which the only evidence for carcinogenicity is of questionable significance to human exposures.