Vista Chemical Company
15990 N. Barker's Landing Rd.
Post Office Box 19029
Houston, Texas 77224
Phone (713) 531-3200

JJH: JCL: TGG: RF
XF: ____________

March 20, 1985

VIST/

Ms. Dora Flora
Lever Brothers Co., Inc.
45 River Road
Edgewater, N.J. 07020

Dear Dora;

Enclosed is a Material Safety Data Sheet for ALFONIC 1412-60 Sodium Ether Sulfate. As you are aware, this product has not been produced in commercial quantities, therefore this MSDS is marked as a draft. This is to assure that any changes in product specifications or physical properties are made prior to plant production of this product on a commercial scale. However, the majority of information on the MSDS regarding safe handling of this product should not change significantly.

Please contact me at 713-531-3445 if you have any question regarding the safety and health aspects of this product.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles
Director
Industrial Hygiene &
Product Safety

cc: Chuck Irwin
Charles Sabatino

Enclosure

JJH: JCL: ~~TGG:~~ RF
XF: None

TO: Bill McClain

FROM: Tom Grumbles
DATE: March 19, 1985

Interoffice Communication

VISTA

SUBJ: PRUDENTIAL PRESENTATION

Enclosed are materials relating to the following VISTA Chemical "Risk Control" programs.

1. Industrial Hygiene Program Assessment Program
2. Material Safety Data Sheet Program
3. Toxicology Assessment Committee
4. Transportation Emergency Response Plan

These programs are briefly summarized below.

<u>Industrial Hygiene Program</u>

This was instituted in 1981. The criteria and methods are described in the attachment and are basically self explanatory. To date, all plants have had one assessment and the larger plants (LCCP, Aberdeen and Baltimore) have been assessed twice. This program is ongoing but will be revised for VISTA. For example, we no longer have the corporate hygienist to use as a team member.

<u>Material Safety Data Sheet Program</u>

This includes the procedure for developing a MSDS and the distribution policy. The procedure for preparing a new, or revising an old, MSDS is basically a two tier review system. VISTA changes also must be made to reflect the new organization. It should be noted that we don't produce very many new products.

In 1983, the procedure to annually distribute MSDS's to current customers was developed. This was done once before the OSHA HAZARD Communication Standard, requiring a substantially similar program, was promulgated. Basically, a program with greater detail and more timely distribution after first purchase is now required. We are currently developing this program.

<u>Toxicology Assessment Committee</u>

The charter describes the basic function of this committee. It is designed to assure that complete and appropriate toxicology testing of our products is done to meet product liability concerns and customer needs. This committee also must be revised to meet VISTA needs and organization.

Transportation Emergency Response Plan

This program assures proper communication and response in the event of transportation emergencies involving VISTA products. VISTA has a 24-hour ChemTrec number that is administered through the LCCP guard house.

Please let me know if you need further detail on any of the above. There are other miscellaneous program we could discuss at the meeting (Medical testing, DOT HAZ, Mat., etc.) if appropriate.

Tom

Thomas G. Grumbles

Attachments

DEVELOPMENT OF MATERIAL SAFETY DATA SHEETS

FOR CONOCO CHEMICALS' PRODUCTS

The office of the Manager of Biomedical and Environmental Affairs will have overall responsibility for and co-ordinate the development of Material Safety Data Sheets (MSDS). The following process will be used.

1. Develop first draft of new MSDS.

2. Circulate first draft to the following areas for edit and comment.

   A. Medical Division - to review first aid, medical treatment information, and toxicology.

   B. Chemicals Research Division - to review technical information, ingredients, physical data, reactivity data, and storage and transprotation information.

   C. Plant Safety Director - to review fire and explosion data.

   D. Transportation - to review hazard~~ous~~ classification and transportation information.

3. Develop final draft based on the above input and circulate to all of the above and the following people or areas for final review.

   A. Product Manager

   B. Marketing Manager

   C. Legal Department

4. After final review the MSDS will be sent for printing.

CONOCO CHEMICALS - MATERIAL SAFETY DATA SHEET

DISTRIBUTION PROCEDURES

It is Conoco Chemicals policy that customers and others handling our products should have the information necessary to do so in a safe and healthful manner. To achieve this goal, Material Safety Data Sheets have been developed for our products. Following are the procedures used to distribute the necessary information.

I. The Material Safety Data Sheet program will be administered by the Biomedical and Environmental Affairs Department.

II. On an annual basis, applicable Material Safety Data Sheets will be mailed to current customers, terminals handling our products and toll processors. This will be done in cooperation with Marketing Administration. Mailing lists will be generated by product or product areas from the Pricing Notification List. The MSDSs will be sent with a cover letter signed by the Vice President, Commercial.

III. During the period between annual mailings, Biomedical and Environmental Affairs will be notified of new or first time customers so that applicable MSDSs can be sent as needed. This will be done by copying the Biomedical and Environmental Affairs Department with the Update Price Notification Records File letter when new customers are added.

IV. Other requests received during the period between annual mailings should be directed to the Biomedical and Environmental Affairs Department.

V. If there is a significant change or addition of information on a MSDS, revised copies of the MSDS will be sent to current customers of the affected product as soon as practicable.

VI. The following records will be kept by Environmental:

A. One copy of the cover letter and the mailing list for the annual mailing.

B. A copy of the transmittal letter for any other mailing during the year.

CHARTER

CONOCO CHEMICALS TOXICOLOGY ASSESSMENT COMMITTEE

(CCTAC)

BASIC FUNCTIONS OF THE COMMITTEE

1. Review toxicological testing needs for Conoco Chemicals products and make recommendations through appropriate channels to achieve testing.

2. Select, audit and monitor contract testing laboratories to assure testing results are valid and produced in a reasonable time frame and at appropriate costs.

3. Review customer requests for toxicology testing data and studies before releasing this information.

4. Review of new products or modified products to determine if a Pre-manufacture Notice under TSCA is necessary.

5. Develop effective channels of communication internally and externally for the information produced by this committee.

MEMBERSHIP

The membership of the committee will be as follows:

T. G. Grumbles - Director of Industrial Hygiene - Chairman
W. D. Broddle - Senior Toxicologist - Medical Department
W. L. Groves - Administrative Asst. - Chemical Safety
O. C. Kerfoot - Director, Chemicals Technical Service
M. Malloy - Legal Department Representative

MEETING DATES

The committee shall meet routinely on a quarterly basis. Other meetings may be scheduled as needs arise.

MISCELLANEOUS

A written record of all proceedings will be kept. This record will include items such as meeting agendas, meeting minutes and other supporting documents.

CONOCO CHEMICALS: INDUSTRIAL HYGIENE AUDIT SYSTEM

BASIC GOALS

1. To assure that all feasible steps are being taken to adequately protect the health of Conoco Chemicals employees.

2. To assure compliance with federal and local regulations.

3. Assess adherence to company policies and good practice.

4. Identify areas of need based on the above and make recommendations to aid in meeting those needs.

PROCEDURE:

Each plant will be audited at least every two years with actual frequency determined by need. The audit will be conducted in three phases as outlined below.

1. Pre-Audit - Prior to the audit the plant will be contacted to arrange a time of visit agreeable to all. The time spent in the plant will vary dependent on size of the plant and extent of the existing program.

   The plant to be audited will be notified of the audit criteria to enable preparation of necessary materials for review and assure the availability of key personnel to be interviewed.

2. Site Visit - The on site audit will consist of two basic parts.
   a. The majority of the audit will be performed "in-office". An opening conference will be held with management and other affected staff personnel to describe the purpose and process of the audit. The major activity will involve review of written programs, air sampling data, recordkeeping, and overall administration of the program. The specific aspects of this review are attached as Appendix I.

   b. The second phase of the audit will involve a walk-through inspection of the plant. This walkthrough will be done in OSHA style to identify obvious areas of non-compliance as well as allow for an assessment of administration and success of written programs.

   c. A closing conference will be held with appropriate plant management before the audit team leaves the plant. Audit findings, preliminary recommendations, and report format and distribution will be discussed.

3. Post-Audit - A written report of the audit findings will be addressed to the Plant Manager, with a copy to the Vice President of Operations, General Manager of Manufacturing, ~~and~~ Chemicals' Medical Director, and Corporate Industrial Hygiene Director.

AUDIT TEAM:

The audit will be conducted by the Director of Industrial Hygiene, a corporate Medical Department Hygienist, and a person involved in hygiene activities from another Conoco Chemicals Plant.

INDUSTRIAL HYGIENE AUDIT

ON-SITE CRITERIA

The following items will be considered where applicable to the given facility or operation under review. This list is a guideline and not intended to be all inclusive or totally limiting.

A. Program Administration

1. Definition of Responsibilities (Departments, People)
2. Structure of the program
3. Administration of the program
4. Communications (in-plant, external)

B. Review of Written Programs

1. Chemical Exposure Abatement Programs
2. Written determinations
3. Portions of Safety Procedures with reference to industrial hygiene procedures (if applicable)
4. Other specific programs (i.e. Respiratory protection, education programs) will be reviewed at other times during the audit.

C. Plant Recognition of Hazards

1. Chemicals present in the plant
2. Current list of chemicals
3. Availability of MSDS's or similar information on chemicals in the plant
4. Communication with the purchasing group
5. Review of new chemicals or new uses of chemicals in the plant
6. Periodic review/updating of material

D. Hazard Evaluation Programs

1. Sampling program review
   a. What agents/chemicals are sampled
   b. Sampling frequency
   c. Criteria for sampling frequency

2. Program Administration
   a. Placement of sampling devices
   b. Observation of sampling
   c. Job/task information for overexposure determinations
   d. Sample retrieval and labeling
   e. Sample storage

3. Sample Analysis

4. Reporting of Results
   a. Format
   b. Distribution

5. Input to Industrial Hygiene Computer Storage and Retrieval System

6. Sampling Records

7. Sampling Equipment and Methods
   a. What's available
   b. Calibration of equipment (frequency, records, methods)

E. Hazard Control

1. Review of specific control procedures

2. Input and review of proposed process or equipment changes

3. Evaluation of newly installed controls

4. Ventilation systems review
   a. Needs and use
   b. Testing of devices (hoods, exhausters, etc.)
   c. Maintenance of systems
   d. Records of inspections

5. Respiratory Protection Program
   a. Review of program for compliance with OSHA regs
   b. Administration of program
   c. Recordkeeping.

6. Other personal protective equipment
   a. Need
   b. Selection
   c. Availability and use

F. Review of Exposure Records

1. Regulatory compliance

2. Compliance with company policies

3. Recordkeeping

G. Education Programs

1. Present program review

2. Frequency of training

3. Administration of programs

H. Medical Surveillance Programs

1. Administration of program

2. Results of review of program previously done by Dr. Massad will be discussed

I. Storage and Handling of Hazardous Materials

1. Facilities

2. Equipment used

3. Methods used

4. Labeling/identification in plant

J. General Sanitation

1. Eating facilities

2. Restrooms

3. Change rooms

4. Potable water supply

5. General housekeeping

K. Employee Awareness of Hazards

1. Personnel interviews to be conducted

2. Work practices observed

L. Miscellaneous

1. Sign-posting in plant

2. Light levels in work areas

APPENDIX

CONOCO CHEMICALS INDUSTRIAL HYGIENE AUDIT SYSTEM

The following guidelines will apply to those plants receiving second round audits.

SITE VISIT

During the second audit emphasis will be placed on reviewing the initial audit report. Responses to the recommendations made in the report will be reviewed in terms of progress to achieve the recommendation or other plant action regarding the report items.

PLANT RECOGNITION OF HAZARDS

The area of employee awareness and recognition of chemical hazards, plant programs to communicate workplace hazards, and community "right-to-know" is becoming increasingly important. State and federal legislation regarding these subjects is well underway. Emphasis will be placed on assessing plant programs in these areas. Such areas include:

A) Formal education or training programs

B) Other employee information resources

C) Employee attitudes and awareness of the above items