

TGG

TO: Distribution

FROM: M. M. Goodreau

DATE: December 18, 1986

Interoffice
Communication

SUBJ: HAZARDOUS MATERIALS TRANSPORTATION

VISTA

On November 21, 1986 the Hazardous Materials regulations were amended by incorporating into these regulations, as hazardous materials, all substances designated as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, better known as Superfund. The intended effect of this action is to enable carriers of hazardous materials to specifically identify Superfund hazardous substances and to make the required notification if a discharge occurs. The regulation becomes effective January 1, 1987.

What this means to Vista is that the hazardous materials descriptions and hazard classes will change for certain products, and in some cases, products previously shipped as non-regulated will now be regulated as hazardous materials during transportation. Changes in placarding, equipment specifications, and insurance may also occur.

The significant changes involve shipments of ether sulfates, plasticizers, and hazardous waste. Below I have outlined what changes will occur to the hazardous materials descriptions for these materials:

Ether Sulfates

Before: Compound, cleaning, liquid, combustible liquid, NA 1993, "Placarded" combustible

After 1/1/87: RQ Compound, Cleaning, liquid, (1,4-dioxane), Flammable Liquid, NA 1993, "Placarded" Flammable

Plasticizers (Vista 108P, 610P, VRP)

Before: Not regulated.

After 1/1/87: RQ Hazardous Substance, liquid, N.O.S., (di-n-octyl phthalate), ORM-E, NA 9188.

Hazardous Waste (waste stabilizer from Aberdeen)

VVV 000008893

Before: Hazardous Waste, Liquid, N.O.S. (contains barium, cadmium, zinc), ORM-E, NA 9189.

After 1/1/87: RQ Hazardous Waste, Liquid, N.O.S. (EPA EP Toxicity), ORM-E, NA 9189

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PCBs for Disposal

Before: RQ Polychlorinated biphenyls, ORM-E, UN 2315

After 1/1/87: RQ Hazardous Substance, Liquid, N.O.S.,
(Polychlorinated biphenyls), ORM-E, NA 9188.

Changes to the COEDS Hazardous Material Description file are in the process of being made.

We will be working with the plants to ensure compliance with the January 1 deadline. The Environmental Coordinators will be sent a separate memo regarding the shipment of hazardous wastes. I have attached a copy of the regulation and a summary from the Hazardous Materials Advisory Council. Please review these to determine what changes should be made in your respective areas. I will be available to answer questions and help out in any way.

What this means to Vista is that the hazardous materials descriptions and labels will change. The current practice, for example, is to ship polychlorinated biphenyls as a non-hazardous material. During the reclassification process, equipment specifications, and procedures may also change.

Changes in the way hazardous materials are handled will affect the way they are stored, transported, and disposed of. It is important that we all understand what these changes mean.

M. M. Goodreau
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