

TGG: JCL: MMG: AJO: RF

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TGG: JCL: MMG: AJO: RF
XF:

TO: Distribution

FROM: T. G. Grumbles

DATE: April 18, 1989

Interoffice
Communication

SUBJ: REGULATORY CLASSIFICATION FOR VISTA ALUMINA

VISTA

Attached is a memo regarding the regulatory status of Vista Aluminas. Specifically, their status under SARA Title III reporting sections and OSHA Hazard Communication Standard are reviewed.

The research indicates that due to "nomenclature" specifics, a change in the 313 reporting status is necessary for some Vista aluminas.

Please let me know if you have questions on the attached.


T. G. Grumbles

dlj

Attachment
.615

Distribution: M. G. Hayes, R. Arnold, K. L. Fogg-LCCP
J. Fenton, B. Carradine-Ponca City

cc: M. M. Goodreau, W. L. McClain

*Animal
Testing
ensure
about
substance*

VVV 000010393

TO: T. G. Grumbles

FROM: M. M. Goodreau

DATE: April 13, 1989

Interoffice
Communication

SUBJ: CATAPAL ALUMINA

VISTA

Regulations under the OSHA Hazard Communication Standard and SARA Section 313 require you to have precise information on the definition, nomenclature, and CAS number of your product to determine its regulatory status. Within Vista the terms alumina, aluminum oxide, aluminum hydroxide, etc. are used for Vista's CATAPAL Alumina's. This wide variation in nomenclature use has caused some confusion when determining the regulatory status of our alumina's. We have researched this issue to clarify the regulatory status of CATAPAL Alumina's. The following classifications and resultant regulatory requirements have been developed.

CATAPAL G and GST (calcined and ground calcined alumina) and Whiskers are believed to most accurately be defined as aluminum oxide's with the CAS number 1344-28-1. Table I (attached) shows other pseudonyms listed in the TSCA inventory for this material.

All other LCCP produced CATAPAL Alumina's are believed to be most accurately be defined as Boehmite with the resultant CAS number 1318-23-6.

CATAPAL G and GST aluminas and whiskers, defined as aluminum oxide, CAS No. 1344-28-1, are listed both by name and CAS number on the SARA Section 313 list of Toxic Chemicals. Emissions of aluminum oxide must be reported annually to the EPA. In addition, suppliers of products containing 313 chemicals must annually inform their customers of the presence of 313 chemicals in a product.

Aluminum oxide (Catapal G and GST aluminas and whiskers), CAS No. 1344-28-1, is listed both by name and CAS number in the OSHA Z-Tables and the ACGIH TLV's with a PEL/TWA of 10 mg/M³ total dust. Because it is listed in these reference sources it is a chemical on OSHA's "floor list" of hazardous chemicals, subject to all provisions of OSHA's Hazard Communication Standard (HCS).

The products described by the CAS No. 1318-23-6 are not subject to SARA Section 313. As to whether they are subject to the OSHA HCS depends on Vista's independent hazard evaluation. The other "alumina's" listed in Table I are not listed by name or CAS number in OSHA's Z-Tables or ACGIH TLV's. They are, however, considered to be "nuisance particulates" which are listed by both reference sources with a PEL/TWA of 10 mg/m³ total dust. OSHA has recently stated that "nuisance particulates" are hazardous as defined by the OSHA HCS as a result of their being listed in these reference sources. OSHA continued to say that you may perform an independent

VVV 000010394

Grumbles Memo
April 13, 1989
Page 2

hazard evaluation and may determine the nuisance particulate in question to be non-hazardous. Until the independent evaluation is completed, the material is assumed to be hazardous, and subject to all provisions of OSHA's HCS. After much discussion and a review of available toxicology data, we have determined that all CATAPAL alumina products, excluding CATAPAL G, GST, and Whiskers, are nonhazardous as defined by the OSHA hazard communication standard.

If I can provide further clarification on this subject, please contact me.

M. M. Goodreau

M. M. Goodreau

dlj
.402

cc: J. R. Drumwright, D. L. Cohen, W. L. McClain, G. Hoenes, W. S. Tuzinkiewicz

M. G. Hayes, K. L. Fogg-LCCP, J. T. Fenton-Ponca City

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TABLE I: PSEUDONYMS AND CAS NUMBERS

1344-28-1	Al_2O_3 alumina aluminum oxide (as listed in the TSCA inventory) alumina, calcined - aluminum oxide
1318-23-6	AlHO_2 or $\text{Al}(\text{OH})\text{O}$ or $\text{Al}_2\text{O}_3 \cdot \text{H}_2\text{O}$ Boehmite (as listed in the TSCA inventory) Pseudoboehmite
24623-77-6 inventory)	aluminum hydroxide oxide (as listed in the TSCA $\text{Al}(\text{OH})\text{O}$ or AlHO_2
21645-51-2	AlH_3O_3 or $\text{Al}_2\text{O}_3 \cdot 3\text{H}_2\text{O}$ or $\text{Al}(\text{OH})_3\text{OH}_3$ aluminum hydroxide (as listed in the TSCA inventory) alumina trihydrate aluminum trihydroxide aluminum hydrate hydrated alumina hydrated aluminum oxide

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