

PVC

TO: Tom Huffman

FROM: T. G. Grumbles

DATE: February 17, 1988

Interoffice

Communication

SUBJ: LABELING OF IN-PLANT PVC AND VCM CONTAINERS:
REGULATORY APPLICABILITY

VISTA

There have been multiple activities and actions regarding OSHA regulatory requirements impacting the labeling of PVC and VCM "containers". Specifically, questions regarding in-plant container requirements have recently been raised. The following memo is to clarify the requirements for in-plant containers. There are two regulations affecting the labeling of in-plant PVC and VCM containers. The OSHA Vinyl Chloride Standard (1910.1017) requires the following:

A. Containers of vinyl chloride shall be legibly labeled:

Vinyl Chloride
Extremely Flammable Gas Under Pressure
Cancer Suspect Agent

B. Containers of polyvinyl chloride shall be legibly labeled:

Polyvinyl Chloride (or Trade Name)
Contains
Vinyl Chloride
Vinyl Chloride is a Cancer Suspect Agent

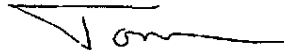
There are also requirements for PVC Waste containers. A copy of the applicable sections of the regulation is attached. The container definition does not include pipes. Items A. and B. above are applicable to all in-plant containers.

The OSHA Hazard Communication Standard (1910.1200) requires containers of chemicals determined to be hazardous to be labeled with the appropriate chemical identity and appropriate hazard warning. Specific to VCM, if a container contains a substance with greater than 0.1% of a recognized carcinogen or is known to present a health hazard at levels below 0.1% it must be labeled. Vista has determined that VCM is covered by 1910.1200. It is Vista's determination that PVC product is not hazardous under 1910.1200 and any additional labeling requirements do not apply to PVC product containers. It should be noted that containers of off-spec, etc. PVC that are known to contain high RVCM must be evaluated for 1910.1200 labeling requirements.

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Tom Huffman
February 17, 1989
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I have also attached several memos regarding the recent labeling activity for "shipped" PVC containers.



T. G. Grumbles

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cc: WLM

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