

OSHA labeling
need one for desk

TO Distribution

FROM: Tom Grumbles
DATE: July 12, 1985

Interoffice
Communication

SUBJ: PRODUCT LABELING MEETING OF JULY 9, 1985

VISTA

The agenda for the subject meeting is attached. A summary of the discussions and action items from the meeting is below.

1. Empty Drum Hazard Warning Label - The language below has been reviewed by Legal and will be used for the empty drum hazard warning:

Empty containers may be hazardous due to product residues. Do Not Reuse empty container without commercial cleaning or reconditioning. Store empty container away from heat and flame.

The warning will appear at the bottom of all OSHA labels and separately on all other product labels on drums.

There has been concern expressed regarding the empty drum hazard warning label appearing on a non-permanent drum label. This was discussed at length and to summarize, it is the general consensus that considering the difficulty of silkscreening the above warning on drums, and the inability to fully protect ourselves when drums leave our control the warning appearing on the label would be adequately protective.

Additional corporate identity specifics for drums will be pursued outside of this project.

2. Label "Mock-ups" were presented. It was decided that an 8"x8", black on white, adhesive, vinyl label will be used. This design, size, and color will stand out well on the Vista blue drums. A copy is attached.
3. One cost estimate was received based on the specifics above, expected label content, and an initial run of 50,000 labels. The estimate was \$9,500, assuming we provide camera ready art to the printer.

The art work costs have not been estimated at this time. Also, the need to label bulk containers (discussed in item #4) will add to art and printing costs. More definitive estimates can be developed as label content and quantities are developed.

VVV 000016821

4. Based on the items discussed below, it has been determined that to assure compliance with the OSHA Hazard Communication Standard and to further meet product liability concerns bulk containers

(railcars, trucks, portable tank container) should be labeled in addition to DOT markings and placards.

A recent draft of the OSHA Compliance document for the standard suggests that label information should be conveyed with bulk shipments to customers. Additional labeling of bulk containers is consistent with product liability concerns and is evolving as general industry practice.

Logistically this will probably have to be done with an envelope/tag system similar to what is currently done for VCM and some PVC cars. This would also appear to be the simplest from an operational standpoint. The label or label and envelope could be applied at the same time the container seal is applied.

The label would probably be a 4"x4" reduction of the drum labels with the empty drum hazard warning removed.

5. The logistics of assuring label supplies and label application are controlled for "out of plant" drumming were discussed. This would include drumming at processors and contract drummers, and bulk container labeling at contract terminals.

S&T will develop procedures and guidelines to assure the above.

6. Based on our experience with the VCM warning label on PVC bags concern has been expressed regarding the potential impact of the additional product labeling on exports.

Based on Legal review, there appears to be no regulatory conflicts with labeling requirements international transportation regulations. However, we should consider communicating the new labeling requirements to our identifiable foreign customers to avoid potential shipment problems.

7. Labeling of other than product containers leaving the plants that contain hazardous materials will have to be labeled. Plant procedures will have to be developed to assure that these containers are labeled.

Customer samples will also have to be labeled. The existing sample labels will have to be expanded. The 4"x4" bulk container tag format can probably be used.

ACTION ITEMS

1. Darwin Phillips will work on sources and methods (tags, laminated labels, etc.) for bulk container labeling

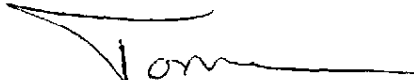
VVV 000016822

Distribution
Page 3
July 12, 1985

2. Darwin Phillips will verify label adhesive compatibility for various drums and containers we use.
3. S&T will begin to develop quantities of labels needed for specific products being drummed.
4. Tom Grumbles will write the additional labels needed for bulk containers.
5. Tom Grumbles will get Bob Lamons final label copy for all required labels to allow the art work to be done.

It is understood that S&T will need approximately 60 days before the November 25 compliance date to implement the necessary procedures and assure drums in storage are labeled.

I will propose the next meeting date and a schedule for the action items in the near future.



Thomas G. Grumbles

ajo/007

Attachments

cc J. A. DeBernardi
F. Thomas
Safety Directors

Distribution:

R. R. Cooley
D. J. Corrigan
H. W. Hilgers
C. F. Putnik
R. M. Lamons
C. R. Miller
W. R. Parker
D. R. Phillips
T. S. Randolph /
P. Carey ✓

VVV 000016823

PRODUCT LABELING MEETING AGENDA

July 9, 1985

1. Empty Drum Hazard Warning TGG/WLM
 - a. Language
 - b. Placement options
 - c. Legal opinion
2. Review Label Proposals RML
 - a. Colors
 - b. Size
3. Approximate Costs DRP
4. Labeling of Bulk Containers WLM/TGG
 - a. OSHA interpretation
 - b. Legal opinion
 - c. Additional labels
5. Labeling Logistics/Control
 - a. In-plant
 - b. Ex-plant
 - c. Supplies, distribution, etc.
6. Export Impacts
 - a. Legal issues
 - b. Customer relations
7. Other Issues
 - a. In-plant labeling of other than product containers
 - b. Sample labels

VVV 000016824

Vista Chemical Company
15990 N. Barker's Landing Rd
Post Office Box 19029
Houston, Texas 77224

VISTA

ALFONIC® 1412-40 Ethoxylate

(Ethoxylated Dodecanol, Tetradecanol mixture)

CAUTION! MAY CAUSE CONTACT IRRITATION

Avoid prolonged or repeated contact with skin
Avoid contact with eyes

FIRST AID In case of contact, immediately flush eyes with large amounts of water for at least 15 minutes. Call a physician. Flush affected skin areas with water. Call a physician if irritation persists.

VVV 000016825

Empty containers may be hazardous due to Product residues. **Do not reuse** empty container without commercial cleaning or reconditioning. Store empty container away from heat and flame.