

JJH: JCL: TGG: RF
XF: _____

TO: Bill McClain

FROM: Tom Grumbles
DATE: January 29, 1985

Interoffice
Communication

SUBJ: OSHA HAZARD COMMUNICATION STANDARD LABELING REQUIREMENTS

VISTA

The subject standard 29 CFR 1910.1200 requires that containers leaving a plant be labeled with the chemical identity, appropriate hazard warning and name and address of the responsible party (1910.1200(f)(i)). This section (attached) further states that this be done in a manner which does not conflict with DOT regulations.

My question is if a bulk container (greater than 110 gallons) is labeled or placarded in accordance with the DOT classification scheme, is additional labeling required to comply with the OSHA standard?

The DOT classification scheme deals predominately with physical hazards (i.e., flammable, corrosive) and except for the Poison A and B classification do not deal with health hazards as defined by the OSHA standard. In most cases there is no specific chemical identity on the container. Also, DOT is very specific as to how materials must be classed and identified for transportation purposes.

Please let me know when we can discuss this issue. Your prompt attention to this matter is requested as the compliance date for this labeling requirement is November 25, and it would require significant effort to assure a system was in place to comply with any additional labeling requirements for tank trucks and railcars.


Thomas G. Grumbles

ajo/006

Attachment

VVV 000016027

JUH: JCL: TGG: RF
XF: HAT MAT

TO: Fayette Tasby, Roscoe Cooley

FROM: Tom Grumbles
DATE: January 28, 1985

**Interoffice
Communication**

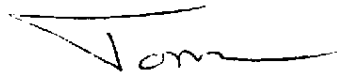
SUBJ: ORDER ENTRY OF HAZARDOUS MATERIALS: MULTIPLE PRODUCT LISTING

VISTA

It has come to our attention that when multiple product listings are entered on a Bill of Lading, the potential exists for an incorrect hazardous material description or no description to be printed on the Bill of Lading. This could result in non-compliance with DOT regulations and significant monetary fines.

The problem is a result of the "logic" COEDS uses to determine the need for and which specific hazardous materials description is printed when multiple products are listed on the Bill of Lading. We are reviewing the options for fixing this system problem, however, in the interim I am asking that any multiple product listings routinely used be reviewed by me to assure the proper hazardous materials description is being used.

Your cooperation in this matter is appreciated.



Thomas G. Grumbles

ajo/006

cc C. Williams
 F. Thomas
 B. Tuzinkiewicz
 T. Randolph

VVV 000016028