

IGG: JCL: MMG: AJO: RF
XF: Desk

TO: Paul Dyke

FROM: T. G. Grumbles
DATE: January 3, 1989

Interoffice
Communication

SUBJ: DRUM LABEL FORMAT FOR ALCOHOL BLENDS

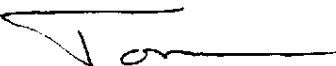
VISTA

The labels on most Alfol blends are necessary for compliance with the OSHA Hazard Communication Standard. The standard also requires that the material safety data sheet for the product contain "the identity used on the label". It would be considered non-compliance to have MSDS's for Alfol blends indicating "all blends" and have specific blend names on the label. More specifically changing the labels would also require significant MSDS changes.

With few exceptions the Alfol blends present the same hazards and the current labels do provide adequate hazard warning with the "all blend" labeling scheme.

However, I do understand the concerns regarding specific product identification. I believe this issue has been addressed in other areas, such as alumina, where a "generic" hazard warning label was used, and alternate product identification methods were developed.

Before changing the labels and MSDS's, I propose we meet to discuss other options to meet the product identification concerns. Please let me or Michele know how you want to proceed.



T. G. Grumbles

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cc: S. Holmes, J. Zuilhoff, T. S. Randolph-LCCP

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