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OSHA HAZARD COMMUNICATION RULE

LABELING REQUIREMENTS COMPLIANCE PROPOSAL

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PURPOSE AND SCOPE

Proposed herein is a means of compliance with the labeling requirements of the OSHA Hazard Communication rule as it applies to the Aberdeen plant.

LABELING REQUIREMENTS

The OSHA rule requires that employees be provided a method by which they may know the identity and hazards of materials with which they work. For more details, see the attached "OSHA HAZARD COMMUNICATIONS RULE - A SUMMARY OF EMPLOYER RESPONSIBILITIES," dated February 12, 1985.

CONTAINERS FROM HAZARDOUS MATERIAL SUPPLIERS

1. Insist that suppliers provide labeling on their containers which conforms to the requirements of the OSHA rule.
2. Keep hazardous materials in manufacturer-supplied containers whenever feasible.

PROCESS VESSELS AND PIPING

1. Vinyl Reactor Areas

a. Replace the twelve regulated area signs in the two vinyl reactor areas with customized signs (35 1/2 inch x 35 1/2 inch "LXSIGN" with red lettering on a white background) available from Stonehouse Signs, Inc. at \$57.46 each. These signs would preclude the need for labeling individual vessels within the units by referring to hazardous material reference books, wherein more explicit information may be found.

b. Legend:

VINYL CHLORIDE MONOMER
USED IN MOST VESSELS AND PIPING IN THIS AREA
AREA BOUNDED BY YELLOW LINE

CANCER-SUSPECT AGENT AREA
AUTHORIZED PERSONNEL ONLY

OTHER HAZARDOUS MATERIALS IN USE
SEE HAZARDOUS MATERIALS REFERENCE BOOK
IN CONTROL ROOM FOR HAZARDS

2. VCM Tand Farm Area

a. Install two customized signs (35 1/2 inch x 35 1/2 inch "LXSIGN" with red lettering on a white background) available from Stonehouse Signs, Inc. at \$57.46 each (est.).

b. Locations:

- (1). Twenty feet south of no. 1 water well.
- (2). Thirty-three feet east of the railroad tracks and three feet south of the walkway leading from Entrance Road to the tank farm.

c. Legend:

**VINYL CHLORIDE MONOMER
USED IN MOST VESSELS AND PIPING IN THIS AREA**

**CANCER-SUSPECT AGENT AREA
AUTHORIZED PERSONNEL ONLY**

**SEE HAZARDOUS MATERIALS REFERENCE BOOK
IN CONTROL ROOM FOR HAZARDS**

3. Compound, Dry Blend, and Plasticizer Areas

- a. Leave existing lead compliance signs in place.
- b. Install customized signs (14 inch x 20 inch "LXSIGN" having red lettering on a white background) available from Stonehouse Signs, Inc. at \$18.16 each.

c. Locations:

- (1). Southeast door of Line I.
- (2). Outside main door between Lab and Line I.
- (3). Outside door just northeast of Line I blenders.
- (4). Outside door just west of Line III mill.
- (5). Outside first-floor door just south of Line III and east of Dry Blend.
- (6). Outside first-floor door northeast of Line III.
- (7). Outside first-floor fire door northwest of Line III.
- (8). Outside the four exterior doors of the Plasticizer Building.

c. Legend:

HAZARDOUS MATERIALS USED IN THIS AREA

**SEE HAZARDOUS MATERIALS REFERENCE BOOK
IN SUPERVISOR'S OFFICE FOR HAZARDS**

INTERMEDIATE STORAGE CONTAINERS

1. Except for process vessels, small containers used for immediate transfers, and Color Weigh Room weighups, all intermediate storage containers of hazardous materials must be marked with the same identities (chemical or common names) and hazardous warnings that appear on the manufacturer-supplied containers. Any method of marking is acceptable, provided it is legible.

2. Add the following legend to the "Compound Ticket" used with Compound Color weighups:

CAUTION

**HAZARDOUS MATERIALS
SEE HAZARDOUS MATERIALS REFERENCE BOOK
IN SUPERVISOR'S OFFICE FOR HAZARDS**

ISOLATED STORAGE VESSELS AND CONTAINERS

Because of their remoteness from the plant areas marked with boundary signs as detailed above, certain vessels and containers require their own labeling as follows:

1. Phthalic Anhydride Storage Tanks and Unloading Station
 - a. Install customized signs (14 inch x 20 inch "LX SIGN" having red lettering on a white background) available from Stonehouse Signs, Inc. at \$27.88 each
 - b. Locations:
 - (1). On column just west of storage tanks.
 - (2). On column just east of storage tanks.
 - (3). On southwest column of loading rack.
 - c. Legend:

CAUTION

PHTHALIC ANHYDRIDE

BURN HAZARD

TOXIC

2. Propane Tank Farm
 - a. Use Carlton Industries, Inc. 8 inch x 10 inch propane gas warning sign (cat. no. 8412 - \$6.65 each).
 - b. Locations:
 - (1). Post-mount west of propane tanks.
 - (2). Post-mount south of propane tanks.
3. Small Propane Storage Tanks
 - a. Use Carlton Industries, Inc. 3 1/2 inch x 4 1/2 inch propane gas press-on warning label (cat. no. 8410 - \$20.75 per package of 10).
 - b. Locations:
 - (1). Side of tank east of no. three treatment lagoon.
 - (2). End of tank at fire training ground.

4. Gasoline Tanks

a. Use Carlton Industries, Inc. gasoline warning label (cat. no. 815PV - \$1.65 each).

b. Locations:

- (1). Gasoline tank at fire training ground.
- (2). Gasoline tank at plasticizer tank farm.

5. Diesel Fuel Tanks

a. Use Carlton Industries, Inc. 3 1/2 inch x 4 1/2 inch press-on fuel warning label (cat no. 821PV - \$1.65 each).

b. Locations:

- (1). Fuel tank at fire training ground.
- (2). The four, fire pump engine fuel tanks.
- (3). Diesel tank next to plasticizer tank farm.

6. Sulphuric Acid Storage Tank

a. Use Carlton Industries, Inc. 3 1/2 inch x 4 1/2 inch press-on sulfuric acid label (cat no. 8410 - \$20.75 per pkg. of ten).

b. Locations:

- (1). East end of tank.
- (2). South side of tank.
- (3). West end of tank.

7. Ammonia Storage Tank

a. Use Carlton Industries, Inc. 3 1/2 inch x 4 1/2 inch press-on ammonia warning label (cat no. 8410 - \$20.75 per pkg. of ten).

b. Locations:

- (1). East end of tank.
- (2). North side of tank.
- (3). West end of tank.

8. Chlorine Storage Tanks

a. Use Carlton Industries, Inc. 8 inch x 10 inch chlorine warning signs (cat. no. 8410 - \$6.65 each).

b. Locations:

- (1). East side of chlorine shed
- (2). West side of chlorine shed.

9. Caustic Storage Tank

- a. Use Carlton Industries, Inc. 8 inch x 8 inch caustic warning sign (cat. no. 8410 - \$6.65 each).
- b. Location: North side of Tank 101.

10. Caustic Unloading Station

- a. Use Carlton Industries, Inc. 8 inch x 8 inch caustic warning sign (cat. no. 8410 - \$6.65 each).
- b. Locations:
 - (1). On column south of unloading spot.
 - (2). On column north of unloading spot.

11. Water Treatment Chemicals

Betz Laboratories, Inc. has agreed to provide warning labels for in-plant bulk containers of their hazardous materials.

SUMMARY OF LABELING COSTS

	No. Req'd.	Unit Cost	Tot. Cost
1. Vinyl Reactor area signs	12	\$57.46	\$689.52
2. VCM Tank Farm area signs	2	57.46	114.92
3. Compound, Dry Blend, Plasticizer area boundary signs	11	181.6	199.76
4. Phthalic Anhydride warning signs	3	27.88	83.64
5. Propane gas warning signs	2	6.65	13.30
6. Propane gas warning labels	1 pkg.	20.75/pkg.	20.75
7. Gasoline warning labels	2	6.65	13.30
8. Fuel warning labels	2	6.65	13.30
9. Sulfuric acid warning labels	1 pkg.	20.75/pkg.	20.75
10. Ammonia warning labels	1 pkg.	20.75/pkg.	20.75
11. Chlorine warning signs	2	6.65	13.30
12. Caustic warning signs	3	6.65	19.95
13. Signpost construction (Item 2 above)	2	\$50.00	100.00
	Total Cost:		\$1373.24