

JH: ~~JL~~: ~~EG~~: (RF)
XF: Customer Response

September 27, 1984

VISTA

Mr. Kent M. Reynolds
Chemlink - Manufacturing Division
P.O. Box 370
Sand Springs, OK 74063

Dear Mr. Reynolds:

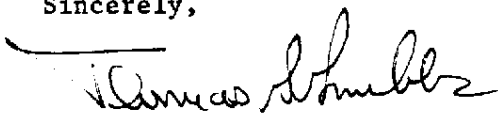
You recently requested a Material Safety Data Sheet and label information for ALFONIC 1412-A Alcohol Ether Sulfate. You also requested a copy of our Hazard Determination Procedure by October 1, in order for you to achieve compliance with the OSHA Hazard Communication Standard.

As you should be aware, Conoco Chemicals' is now Vista Chemical Company. New MSDSs are currently being printed for Vista Chemical products and to meet the standard's content requirement however, I have enclosed a temporary MSDS for Vista ALFONIC 1412-A Alcohol Ether Sulfate. This product is a particular problem in terms of the OSHA standard. The flash point for this product is 74°F, however, due to a DOT exemption for materials containing less than 24% alcohol, it is classed as a "combustible liquid" for transportation purposes and must be placarded and labeled as such for shipment. However, under the OSHA Hazard Communication Standard guidelines this is a flammable liquid. We have not resolved this conflict and have not determined drum label content for this product. We will be in compliance with the standard labeling requirements on or before the effective date of November 25, 1985.

In terms of our hazard determination procedures, we run acute toxicity tests (listed in Section 5) and physical tests for DOT hazard classification (listed in Sections, 3, 4, and 9) on our products. We monitor the scientific literature for any data on our products or similar materials and make changes regarding handling procedures and protective measures when appropriate.

Please feel free to contact me if you need further information at this time.

Sincerely,



Thomas G. Grumbles, C.I.H.
Director, Industrial Hygiene

ajo
Enclosure

cc R. R. Cooley

VVV 000016256

JH: JEL: TSC: RF
XF: Respirators

TO: M. A. Fisher

FROM: T. G. Grumbles
DATE: September 24, 1984

Interoffice
Communication

SUBJ: PROPOSED RESPIRATOR POLICY

VISTA

As we discussed, enclosed is a proposed policy regarding medical certification for respirator users. In summary there is the potential for an employee to be deemed unable to wear a respirator as a result of a medical condition, and if no other job could be found in the plant, termination might be necessary.

We request that you review this policy and the potential termination of an employee resulting from its implementation for defensibility if the company were sued as a result of that termination.

Tom Grumbles
Thomas G. Grumbles

ajo/004

cc J. R. Drumwright, M.D., Jim Carter, Bill McClain

VVV 000016257

10
XF
0937
no more added

JH: JCL: FGG. (RF)
XF: Respirators

TO: Safety Directors

CONFIDENTIAL

FROM: T. G. Grumbles, J. R. Drumwright, M.D.
DATE: September 21, 1984

SUBJ: VISTA MEDICAL STATUS FOR RESPIRATOR USE POLICY

VISTA

Interoffice
Communication

Enclosed is a draft of the policy we discussed at the Industrial Hygiene Meeting in June. This policy will also be reviewed by employee relations to assure consistency with other policies dealing with job requirements and potential disabilities.

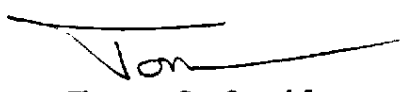
It is Dr. Drumwright's experience, from review of selected medical records, that the potential for a person being judged medically unable to wear a respirator is small. The policy covers new hires as well as current employees to assure all affected employees in the plant have a documented determination on file.

It will be the plant's responsibility to identify the affected persons to be included under the policy. Basically, these people are those routinely wearing respiratory protection, or specifically required to wear respiratory protection during non-routine events such as emergency response or fire-fighting.

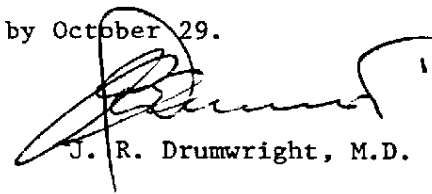
Also attached is a recent article dealing with this issue. I urge you to read this article to clarify the risks involved in respirator use.

Once approved, several issues would still have to be resolved from an implementation and procedural standpoint. These include reimbursement policy, if any, for those not using the van, and questionnaire administration.

Please send your comments to us by October 29.



Thomas G. Grumbles



J. R. Drumwright, M.D.

ajo/003

Enclosure

cc Plant Managers
Jim Carter
R. D. Gamblin
W. L. McClain

VVV 000016258