

AUG 2 1977

BFG RESTRICTED

COVER SHEET

For use with BFG RESTRICTED Information

- 1** Reproduction or dissemination of this document should be held to a minimum consistent with operational needs. Only those BFGoodrich employees with a **"Need-to-Know"** are to be permitted access to the information contained in this document.
- 2** Documents stamped "BFG RESTRICTED" must not be left exposed or unattended and must be stored under lock and key when not in use.
- 3** Further dissemination of this information to other than BFGoodrich personnel is **not authorized** without the approval of the Division Head concerned, or in accordance with applicable established Company policies covering public disclosures.
- 4** **Internal** transmission may be made either by hand-carrying between custodians, or via Company mail in a sealed envelope with the notation "To Be Opened By Addressee Only" indicated on the envelope.
- 5** Transmission or removal of this document **outside** of this facility is not authorized without the express approval of the operating manager concerned, or in compliance with local removal procedures. See BFGoodrich Security Policy No. 300 for external mailing procedures.
- 6** This document must be destroyed by shredding, tearing, or burning and under no circumstances will be disposed of in waste containers, etc., intact.

This sheet is to be used only for BFGoodrich information designated

BFG RESTRICTED

BFGoodrich

NGC 16350

BFGoodrich
Chemical Division
Inter-Organization Correspondence

BFG RESTRICTED

To	See Distribution	From	E. M. Begnaud
Location		Location	Cleveland
Department		Department	5429
Subject	REVISED OSHA LABELING PROCEDURES		Date July 15, 197

Attached are updated labeling procedures that are to be put into effect immediately. These instructions are not significantly different to those issued on September 15, 1975, and currently in effect. The major changes are:

1. Elimination of the cancer-suspect warning from the VCM tank car placard.
2. Labeling the cancer-suspect warning on two sides of the tank car dome.

~~3. Elimination of the cancer-suspect warning from the VCM tank car placard.~~
~~4. Elimination of the cancer-suspect warning from the VCM tank car placard.~~
~~5. Elimination of the cancer-suspect warning from the VCM tank car placard.~~

The plant Shipping Departments continue to have the responsibility of assuring that all applicable packaged goods are neatly labeled prior to shipment. The plant Production Departments are responsible for the labeling of containers of applicable products, at the time of filling. The plants should review the present procedures to insure their compliance in all areas.

Ed.

RJS/pac

Attachment

NGC 16351

DISTRIBUTION:

Cleveland

M. D. McClusky
R. D. Scott
E. B. Osborne
J. L. Nelson
K. Greene
E. W. Harrington
T. H. Smith/J. P. Jackura
W. C. Becker
B. M. G. Zwicker
G. F. Krcmar
T. R. Linak
A. W. Clements
R. D. Savage
✓ H. Waltemate
J. F. Malone (7)
P. J. Weaver (10)
W. F. Brune
L. W. Hardesty
B. C. Birkmeier/R. A. Ellis
R. J. Solak
N. G. Duke
R. L. Steller
G. E. Eilbeck
R. C. Kaminski
G. F. Cohan

Akron

E. K. Bean - WHB-6

Louisville

P. H. Lawrence
P. A. Wagner
C. J. Nosal
A. R. Aquino
W. R. Holstein

Avon Lake General Chemical

R. N. Rylands (3)
R. S. Mather
P. W. Shore
R. M. Sandfry
M. D. Tawney

Avon Lake Technical Center

R. M. Kreager
L. A. Bennett
D. J. Barnicki/H. F. Gough
C. B. Vrabel

Henry

C. B. Cooper (2)
L. R. Mitchell
L. V. Goode

Pedricktown

A. R. Webber (4)
W. E. Kenney

Calvert City

C. L. Woods
F. R. Carvell
G. E. Evens

Long Beach

E. L. Beeler

Kitchener

D. A. Brooks (for info.)

Brecksville

R. A. Krueger

OSHA PRESCRIBED
LABELING PROCEDURE
FOR
VCM, GEON RESINS, COMPOUNDS & LATEX
REVISED DATE JULY 15, 1977

BFGoodrich Chemical Division
Warehousing & Packaging Dept.
July 15, 1977

NGC 16353

Since April 1, 1975, we have been using OSHA prescribed markings on VCM and PVC. Our procedures have followed guidelines suggested by SPI; they have been approved by our management and legal groups. Labeling procedures have been written with the prime objective being to inform the worker of a potential hazard. They are designed to meet with good operating practices. Several revisions have now been made to the original procedures, issued on March 15, 1975 and revised on September 15, 1975. This new issue will update these labeling changes.

All tags and labels outlined in the following procedures shall be neatly applied to the packages or vehicles.

- 1 -

7/15/77

NGC 16354

GENERAL LABELING REQUIREMENTS & EXCEPTIONS

Export shipments of PVC resins or compounds will not normally be made if the product contains more than 10 ppm Residual Vinyl Chloride Monomer (RVCM). Packaged Geon resins and compounds meeting the above requirements and prepared for export shipment shall not be labeled. Materials containing higher RVCM levels than stated above can be shipped export only on the approval of the Administrative Director, International Department, each container of these materials, although approved as stated above, must then be labeled with the required OSHA statement. Pallet loads, not requiring the OSHA labels, will be stenciled "For Export" on all four (4) sides of the top and bottom corrugated trays. If an export overwrap (Package Code 7 and 14) is required, stencil the words "For Export" on all four sides of the overwrap in the upper righthand corner. When individual bags are shipped, stencil the words "For Export" on each bag. Do not label or tag "Export" shipments of Geon latex packaged in drums. Stencil the words "For Export" on the side-wall of the drum near the top.

All products marked "For Export" shall be stored in segregated areas of warehouses. Appropriate signs must be placed in these areas indicating that the material has been prepared for export; the signs must also display the OSHA warning label.

7/15/77

NGC 16355

GENERAL LABELING REQUIREMENTS & EXCEPTIONS (continued)

Do not label or tag bulk "Export" shipments of Geon latex, resin or compounds. Affix a tag or label with the words "For Export" on each inlet and outlet of the bulk vehicle. An exception is Pacific Plastics, Vancouver, British Columbia; they have agreed to accept bulk hopper cars with the OSHA statement required for domestic shipments. This procedure will be used for this customer only until the producing plant is able to ship product consistently below the 10 ppm level.

Shipments to Hawaii, Alaska and Puerto Rico shall be treated as "domestic" shipments.

Armstrong Cork shipments of all PVC products, including dispersion resins, require the OSHA label on each package received at their plants. There may be other exceptions to our marking procedures; these changes will be indicated on each particular customer order.

The following products should not be labeled, except as noted above:

1. Hi-temp Geon compound or resin packages or bulk vehicles.
2. Polyblend packages including Geon Polyblend 8720, or Hycar 1432.
3. Dispersion resins will not be labeled; if the RVCM level is at or below one (1) ppm.
4. Geon latexes 660X1, 660X2 and 660X4. These latexes do not contain vinyl chloride.

The following "exception" products should be labeled:

1. All dispersion resins above (1) ppm will be considered as in grade 6. Any of these materials over one (1) ppm shipped domestically from our plants must have the normal Marketing and Distribution approvals for this grade prior to shipment.
2. Hycar Acrylic Latex 2600X189 & 2600X228 should be labeled according to procedure covering Geon latexes. These are the only Hycar latexes that will require the OSHA label.
3. The following products have been classified as Flexible Geon Compounds and should be labeled: 8880-021, 8880-288 and 8878-288.

VCM RAIL CARS

All VCM tank cars must be labeled with the words "Cancer Suspect Agent" in 1/2" high letters. A label will be placed on two opposite sides of the tank car dome; they will be placed on the sides of the dome parallel to the length direction of the car. The Calvert City plant will apply the dome labels.

7/15/77

NGC 16358

GEON LATEX TANK TRUCK

All tank trucks containing Geon latexes shall be tagged with a single trip service tag (approximately 3" X 5") (BFG 16590A). These tags shall state:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement shall be printed on both sides of the tag. Tags are supplied with eyelets and wire ties attached.

One tag shall be tied to each loading hatch and to the end of each discharge outlet.

Requirements for these tags (BFG 16590A) can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

7/15/77

NGC 16359

BULK HOPPER CARS

All bulk hopper cars containing designated Geon resins or compounds will be labeled:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required OSHA statement is in 3/8" high letters. The labels are a permanent, pressure sensitive type, approximately 3" X 5". They are white with black lettering.

A permanent label must be affixed at each inlet and each outlet. One should be placed in the center of each top manway hatch, on the outside of the cover. A label should also be affixed to the slope sheet of the discharge hopper, directly behind each unloading tube cap. All labels should be neatly and securely applied to cleaned surfaces.

Requirements of these labels (BFG 16611) can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

7/15/77

NGC 16360

GEON LATEX CARS

We are to use a single trip service tag (approximately 3" X 5") (BFG 16590A) for marking inlets and outlets of specified Geon and certain Hycar latex cars. All rail cars containing these latexes will then be tagged:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement is printed on both sides of the tag. Tags are supplied with eyelets and wire ties attached.

A tag shall be tied to the hatch cover and to bottom outlets, where applicable.

Requirements for these tage (BFG 16590A) can be ordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

7/15/77

NGC 16361

GEON RESIN & COMPOUND BULK TRUCKS

We are to use a single trip service tag (approximately 3" X 5") (BFG 16590A) for marking inlets and outlets of specified resin and compound bulk trucks. These tags will read:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required statement is in 3/8" high letters. The tags are off-white with black lettering. The OSHA statement is printed on both sides of the tag. The tags are supplied with eyelets and wire ties attached.

A tag shall be tied to the exterior of each top loading port and/or manway. One shall also be attached at the end (discharge point) of each trailer unloading line(s).

Requirements for these tags (BFG 16590A) can be ordered by using a Forms Requisition. This requisition should be sent to the Cleveland Forms Group.

7/15/77

NGC 16362

GEON RESINS AND COMPOUNDS IN BAGS

It is necessary to label (or stamp) each bag, prior to filling or shipment (in the case of filled bags), containing designated products. The following label (or stamp) will be used on each bag:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All label printing is in BFG red on kraft colored pressure sensitive label stock. Any packages shipped individually, as non-unitized loads, must have one of the above specified labels affixed to each individual container. Hand stamps, containing the required OSHA statement in 1/4" high letters, have been supplied to the PVC producing plants by the Warehousing & Packaging group. Hand stamping ink will be black. These hand stamps may be used as an alternate to labels. Stamping should be done, in a clear area, on the bottom end of each bag where the product and lot identification is located.

Requirements of labels (BFG 16591A) can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

- 10 -

7/15/77

NGC 16363

GEON RESINS AND COMPOUNDS IN BAGS (continued)

Bags are printed with the prescribed statement:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The above statement is located in the gussets, to the right of a Geon Vinyls logo. This printing is in 1/4" letters. The recommended Company statement is located on the back of the bag in 1/8" (min.) high letters. All printing is in BFG red, the same color as other printing on the bags. Bags preprinted with these statements are designated as BFG print layout No. 2.

7/15/77

NGC 16364

GEON RESINS AND COMPOUNDS IN (CT-200) BULK BOXES

One label (BFG 16591A) should be placed on each large side panel (2 labels/box) to the left of the Geon Vinyls logo on specified Geon products. The following label is to be applied to these boxes:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All printing is in BFG red on kraft colored, pressure sensitive label stock.

Requirements for form BFG 16591A can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

LATEX DRUMS

Specified Geon and Hycar latexes packaged in LQP-19 or LQP-20 fibre drums or in DR-7 or DR-8 steel drums will have pressure sensitive labels (BFG 16592A) applied containing the OSHA statement. The OSHA statement will read:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The OSHA statement is in 1/4" high letters. All printing is in BFG blue on kraft colored, pressure sensitive label stock.

A label should be squarely and securely affixed to the sidewall of the drum in the area of the standard printing included on each drum. Printing on the drum should not be obstructed by this label. One label per drum is required. All applicable drums should be labeled at the time they are loaded. No applicable drums should be shipped without the OSHA label.

These labels (BFG 16592A) used by the Geon (and certain Hycar) latex producing plants can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

MISCELLANEOUS PACKAGES & SAMPLES

We occasionally package small volumes of Geon resins, or compounds in special bags, boxes, fibre drums, etc. These containers frequently contain no Company identification. Each of these packages must be labeled:

POLYVINYL CHLORIDE
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS
A CANCER-SUSPECT AGENT

The required OSHA statement is in 1/4" high letters. This pressure sensitive label will normally be in BFG red (BFG 16591A) on kraft colored label stock; a kraft colored label with BFG blue printing (BFG 16592A) may be used if the prime container Company identification is blue.

A label shall be nearly applied to each container.

These labels can be reordered by using a Forms Requisition. This requisition should be sent to the attention of the Cleveland Forms Group.

PVC resins, compounds and latexes are frequently distributed in sample (less than standard package) quantities. The inside containers must also be marked to comply with OSHA regulations. If containers are large enough, labels as specified above, should be used. For small sample containers attach a tag (BFG 16590A) as specified under the "Geon Latex Tank Trucks,"

MISCELLANEOUS PACKAGES & SAMPLES (continued)

and "Geon Resin & Compound Bulk Trucks" sections of these procedures.

Since the purpose of the regulation is to inform the person opening the container of a possible hazard, all sample containers should be placed in an "overwrap" package. We recommend that the outer package not contain the OSHA statement.

VCM sample containers shall be labeled or stenciled with the wording "Cancer-Suspect Agent." This lettering shall be 1/2" high. It should be located in the area of the 3" X 3" DOT Hazardous Materials "Flammable Gas" label affixed to each VCM container.

7/15/77

NGC 16368