

FGG: JCL: ~~MMG~~ RF
XF: Alumina

TO: Ben Decker

FROM: T. G. Grumbles

DATE: August 8, 1986

Interoffice
Communication

SUBJ: OWENS-ILLINOIS ALUMINA HEALTH CLAIMS

VISTA

O-I is correct in informing their customers that an alumina based product does not have the health hazard potential of a silica based product. However, I share your concern if O-I is indicating, by implication or actual verbage, that no further hazard exists.

Nuisance dusts in the respirable range still present an inhalation hazard. The effect, or "disease" potential is different. Nuisance particulates create simple obstructive lung problems versus actual fibrogenic disease as is caused by certain silicas. Both should be avoided.

We would recommend appropriate protective measures be taken, i.e., ventilation and respiratory protection, to prevent excessive exposures to the alumina.

We don't have specific data on Alumina particles in the nanometer range. I would suggest we share our concern with O-I to assure they aren't representing the new alumina based product as hazard free. Let me know if you want help with the correspondence.


Thomas G. Grumbles

ajo/9

cc OCK, MMV

VVV 000015402

0807 *Inns.*HEALTH AND SAFETY

<u>PLANT</u>	<u>1980</u>	<u>1981</u>	<u>1982</u>	<u>1983</u>	<u>1986</u>
ABD	974 (198)*	855 (203)	581 (300)	313	290 (381)
BALT	1,920 (670)	489 (0)	1,039 (750)	1,025	155 (590)
LCCP	631 (0)	99 (0)	118 (118)	193	2150 (490)
VCM	893 (273)	103 (65)	56	0	2193 (74)
OKC	355 (0)	1,498 (268)	55	80	205 (50)
LAB					118 (373)
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TOTAL	4,773 (1,141)	3,044 (536)	1,849 (1,168)	1,611 (0)	5,111 (1,958)

* NUMBERS IN () ARE FOR HEALTH

VVV 000015403

ASSURE COMPLIANCE WITH APPLICABLE REGULATIONS IN THE AREAS OF:

1. HEALTH AND SAFETY REGULATIONS
2. HAZARDOUS WASTE HANDLING AND DISPOSAL
3. AIR POLLUTION - EMISSIONS AND MONITORING
4. WATER POLLUTION - EMISSIONS AND MONITORING
5. HAZARDOUS MATERIALS TRANSPORTATION
 - o CLASSIFICATION, MANIFESTING, PLACARDING
6. FOOD AND DRUG ADMINISTRATION
 - o DIRECT AND INDIRECT FOOD USES

VVV 000015404

PRODUCT LIABILITY PROGRAMS

1. TOXICOLOGICAL TESTING OF PRODUCTS
2. DISTRIBUTION OF SAFE HANDLING AND WARNING
INFORMATION TO CUSTOMERS
3. TRANSPORTATION EMERGENCY RESPONSE SYSTEM
4. CUSTOMER ASSISTANCE WITH PROBLEMS IN THEIR
WORKPLACES - TECH ASSISTANCE WAIVER
5. RECORDKEEPING

VVV 000015405

ENVIRONMENTAL PROTECTION AGENCY (EPA)

1. CLEAN AIR ACT
2. CLEAN WATER ACT
3. SAFE DRINKING WATER ACT
4. TOXIC SUBSTANCE CONTROL ACT
5. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION
AND LIABILITY ACT (SUPERFUND)
6. FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT
(FIFRA)
7. RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

VVV 000015406

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)

1. GENERAL STANDARDS

A. FIRE PROTECTION

B. HARD HATS, ETC.

C. PROTECTIVE EQUIPMENT

2. SUBSTANCE SPECIFIC STANDARDS FOR HAZARDOUS CHEMICALS

A. ETHYLENE OXIDE

B. ASBESTOS

C. NOISE

D. LEAD

VVV 000015407

FOOD AND DRUG ADMINISTRATION (FDA)

1. CERTIFICATION FOR DIRECT AND INDIRECT FOOD USES

2. PESTICIDE USES

VVV 000015408

DEPARTMENT OF TRANSPORTATION (DOT)

1. CLASSIFICATION OF HAZARDOUS MATERIAL

2. PLACARDING REQUIREMENTS

3. MANIFEST/BILL OF LADING CONTENT

4. SHIPPING CONTAINER SPECIFICATIONS

VVV 000015409

REGULATORY CONTROLS

REQUIRE:

1. PROPER EVALUATION OF CHEMICALS BEFORE MARKETING
 - A. IF MATERIAL IS NOT ON TSCA INVENTORY, THEN PMN REQUIRED
 - B. HAZARD EVALUATION FOR LABELING AND TRANSPORTATION CLASSIFICATION
 - C. PREPARATION OF MATERIAL SAFETY DATA SHEETS
2. MANUFACTURE CHEMICALS WITHOUT EXCESSIVE EMISSIONS TO AIR, WATER, OR GROUND
 - A. MINIMIZATION OF WASTE NOW REQUIRED
 - B. WASTE DISPOSAL, STORAGE, TREATMENT HIGHLY REGULATED
3. SELF REPORTING OF NEW INFORMATION
 - A. TSCA SECTION 8 - ENVIRONMENTAL OR HUMAN
 - B. TSCA SECTION C
4. PROPER SAFETY AND HEALTH IN-PLANT
5. PRODUCT LABELING INFORMATION DICTATED
6. CONTAINER/EQUIPMENT SPECIFICATIONS FOR TRANSPORT

VVV 000015410

TO: D. A. Kuhn

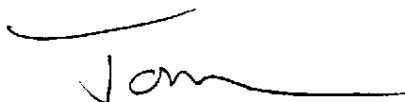
FROM: T. G. Grumbles
DATE: August 14, 1986

Interoffice
Communication

SUBJ: PROGRESS REPORT FOR THE WEEK ENDING AUGUST 14, 1986

VISTA

1. Developed comments for the Vinyl Institute on EPA's proposal to modify the method of determining what a hazardous waste is. As proposed, all Vista's wastewater would be hazardous which would require considerable expenditures to up grade our wastewater treatment facilities.
2. Assisted Public Relations in developing "if asked" statements for Hammond and LCCP.
3. Completed first draft of an Environmental Audit Manual.
4. Worked with LCCC to place a value on the LCVCM hydrocarbon bank. Identified a contractor, which LCCC hired, to provide an appraisal.
5. Conferred with Du Pont regarding Baltimore groundwater assessment. Will meet with Du Pont on Monday, August 18.
6. Met with Engineer on revisions to standards incorporating additional environmental considerations.
7. Made a presentation to the Ponca City overview class regarding environmental and health regulations and product liability concerns.
8. Presented two training sessions to R&D on the requirements of the Toxic Substances Control Act.
9. Met with R&D to discuss completion of the Premanufacture Notification for Alumina XD. The first draft is estimated to be complete the week of August 25.
10. Met with S&T to discuss the development of a DOT Audit Program.



Thomas G. Grumbles

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VVV 000015411