



the GIBSON-HOMANS company

Inter-Department Communication

PLAINTIFF'S
EXHIBIT
GH-207

To U.S. DIVISION/PRODUCTION MANAGERS

Date SEPTEMBER 16, 1985

From HOMER GREGORY Subject OSHA HAZARD COMMUNICATION

As you are aware, OSHA's Hazard Communication Standard (Right-To-Know) goes into effect this year for the manufacturing sector (non-manufacturing sector to be included in future due to recent Court order). The law consists of the following elements and effective dates which will involve you:

1. Labeling of hazardous chemicals - November 25, 1985.
2. Material Safety Data Sheets - November 25, 1985.
3. Written Hazard Communication Program - May 25, 1986.
4. Employee Information and Training - May 25, 1986.

I'll summarize the elements one by one:

1. Labeling - All hazardous chemicals leaving the workplace (finished products in our case) or coming into the workplace (raw materials) must be labeled with the identity of the hazardous chemicals, appropriate hazard warnings and name/address of the manufacturer or responsible party.

Since most of our current product labels comply with the requirements of the Consumer Product Safety Commission (CPSC), we are exempt from further labeling them. We are however, in the process of reviewing all labels to ensure compliance. If you are aware of inadequate or questionable labels, (no hazard warning, address, etc.) please send me a copy. IJ account labels are also to be in compliance with the CPSC or OSHA labeling requirements. A letter to IJ accounts will be sent from this location explaining the law requirements. When our label review is complete, further instructions may be issued.

Incoming hazardous chemicals (can be anything from asbestos to xylene) must be properly labeled with the information mentioned above. Production Managers are to assign a responsible person to check incoming raw materials beginning 15 November (forward title of person to me for use in the company's written program). You will be given a list of raw materials to check and their appropriate warnings. Any raw material not in compliance upon receipt shall not be accepted (a draft letter will be forwarded to each plant to send to their suppliers beforehand). For hazardous materials in stock before 15 November and not in compliance, a request shall be made to the supplier for appropriate labels (a letter will be drafted for your use).

2. Material Safety Data Sheets (MSDS) - Raw Materials: These forms are required for every hazardous raw material used in the workplace. We currently have a copy for the majority of our raw materials and are obtaining the rest. Copies will be sent to each plant so as to be available to each factory worker. Should you receive more current copies from your supplier, please substitute them into the MSDS binders you will receive from this location, and forward a copy to my attention.

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2. Material Safety Data Sheets (MSDS) - (Continued)

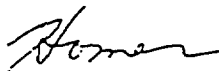
Finished Products: We are required to furnish a MSDS to each manufacturing customer for each product sold to them (copies will be sent to all G-H/Fosroc customers, regardless of status). Initial copies will be sent from this location in October. All future requests for MSDS will be handled by each branch plant (complete set of MSDS will be sent to each plant before the mass mailing). Additional instructions will be sent to you with the set of MSDS.

3. Written Hazard Communication Program - A written plan must be available at each plant describing how we will meet the requirements regarding labeling, MSDS employee training, etc. The written plan will be sent to each plant after the first of next year.

4. Employee Information and Training - Employees must be trained/informed about the requirements of the law, the different chemicals in the workplace, MSDS, labels, etc.. Our company will have a program in place for the Production Manager's meeting in December.

Gibson-Homans policy relating to the new standard will be to document everything (sending out MSDS, attendance at training, etc.). More will follow on the subject. Should you have questions about this "brief" summary, please do not hesitate to contact me.

Regards,



Homer

HAG/sv

cc: Doug Bryant ✓
Eric Wormser
Andy Strachan
Bob Kirkpatrick
Bill Ray
Ken Kaiser
Chemists