

ADK
CSHA Labeling

TO: Safety Directors

FROM: Tom Grumbles
DATE: July 12, 1985

Interoffice
Communication

SUBJ: OSHA HAZARD COMMUNICATION STANDARD: BULK CONTAINER
LABELING

VISTA

It has been resolved that bulk containers (railcars, tank trucks, etc.) will be labeled in addition to DOT placarding and marking requirements. In summary, this decision is based on product liability concerns, evolving industry practice, and continued uncertainty regarding OSHA's stance on this issue.

We are currently investigating how best to do this but the label will basically be a reduction of the drum labels, minus the empty drum warning, in a tag or tag/envelope format similar to the VCM warning tags currently used. Operationally, this will probably be applied by the loader at the same time the container seals are placed.

Details to follow.


Thomas G. Grumbles

ajo/007

cc Plant Managers

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