

BORDEN, INC.

960 KINGSMILL PARKWAY, COLUMBUS, OHIO 43229



MARK A. GRUENWALD, C.I.H.
MANAGER
PRODUCT SAFETY & TECHNICAL SERVICES

August 3, 1987

Mr. Peter L. de la Cruz, Esquire
Keller & Heckman
1150 Seventeenth Street, N.W.
Washington, D.C. 20036

RE: OSHA LABELING

Dear Peter:

Dr. Gottesman suggested I send to your attention the attached letter we received from OSHA concerning target organ effect labeling for PVC.

In light of your ongoing discussions with OSHA concerning a clarification on the labeling of PVC as a carcinogen under the Vinyl Chloride Standard and the Hazard Communication Standard, I believe you might also want to address the issue raised in the attached letter at your August 24 meeting with Frank White at OSHA. This appears to be a generic issue for the PVC industry as a whole to address.

In the interim, we plan to contact the OSHA area office in Illinois to determine the basis for their "suggestion".

We would appreciate any comments that you might have on this subject.

Sincerely,

Mark A. Gruenwald

MAG:sls:attachment
cc: Dr. Gottesman

VVV 000015063

U.S. Department of Labor

Occupational Safety and Health Administration
344 Smoke Tree Business Park
North Aurora, Illinois 60542
(312) 896-8700



July 8, 1987

Borden Chemical Division
Borden, Inc.
180 E. Broad Street
Columbus, OH 43215
Attn: Mark Grenwald

Dear Mr. Grenwald:

Representatives of the Occupational Safety and Health Administration (OSHA) recently visited the following company:

The above mentioned company purchases the following chemical(s) from you:

PVC Homopolymer

At the time of the visit, labels on shipped containers of hazardous chemical(s) supplied by your company were found to be deficient in the following areas:

The label did not give a proper hazard warning to include the following: Respiratory Irritation, Eye Irritation which is target organ and effect.

You are required under OSHA's Hazard Communication Standard (29 CFR 1910.1200) or your State's right-to-know law to perform hazard determinations, label outgoing containers properly and provide copies of MSDS for all hazardous chemicals which you produce or import. A copy of the standard is provided for your reference.

Please immediately send proper labels for the containers of hazardous chemical(s) listed above to your customer.

Thank you for your assistance. If you have any questions regarding this matter, please feel free to contact me at (312) 896-3700.

Sincerely,

Kenneth Yotz
Area Director

VVV 000015064

RECEIVED
JUL 15 1987
M.A. GRUENWALD

Thomas G. Grumbles

VISTA

To Russ Rose

Date 9/21

Subject: AIFonIc 10-22/46/35 etc.

To assure understanding I'm basically waiting for word from you or Matson as to what actual product to test. Matson has approved the testing.

When decided, and the sample is made, it will take 4-6 weeks to get results.

cc Carl Keefoot

VVV 000015065