

OSHA Labeling Std
XIF Desk.

TO Distribution

FROM: Tom Grumbles
DATE: July 12, 1985

Interoffice
Communication

SUBJ: PRODUCT LABELING MEETING OF JULY 9, 1985

VISTA

The agenda for the subject meeting is attached. A summary of the discussions and action items from the meeting is below.

1. Empty Drum Hazard Warning Label - The language below has been reviewed by Legal and will be used for the empty drum hazard warning:

Empty containers may be hazardous due to product residues. Do Not Reuse empty container without commercial cleaning or reconditioning. Store empty container away from heat and flame.

The warning will appear at the bottom of all OSHA labels and separately on all other product labels on drums.

There has been concern expressed regarding the empty drum hazard warning label appearing on a non-permanent drum label. This was discussed at length and to summarize, it is the general consensus that considering the difficulty of silkscreening the above warning on drums, and the inability to fully protect ourselves when drums leave our control the warning appearing on the label would be adequately protective.

Additional corporate identity specifics for drums will be pursued outside of this project.

2. Label "Mock-ups" were presented. It was decided that an 8"x8", black on white, adhesive, vinyl label will be used. This design, size, and color will stand out well on the Vista blue drums. A copy is attached.
3. One cost estimate was received based on the specifics above, expected label content, and an initial run of 50,000 labels. The estimate was \$9,500, assuming we provide camera ready art to the printer.

The art work costs have not been estimated at this time. Also, the need to label bulk containers (discussed in item #4) will add to art and printing costs. More definitive estimates can be developed as label content and quantities are developed.

4. Based on the items discussed below, it has been determined that to assure compliance with the OSHA Hazard Communication Standard and to further meet product liability concerns bulk containers

VEU-149327

(railcars, trucks, portable tank container) should be labeled in addition to DOT markings and placards.

A recent draft of the OSHA Compliance document for the standard suggests that label information should be conveyed with bulk shipments to customers. Additional labeling of bulk containers is consistent with product liability concerns and is evolving as general industry practice.

Logistically this will probably have to be done with an envelope/tag system similar to what is currently done for VCM and some PVC cars. This would also appear to be the simplest from an operational standpoint. The label or label and envelope could be applied at the same time the container seal is applied.

The label would probably be a 4"x4" reduction of the drum labels with the empty drum hazard warning removed.

5. The logistics of assuring label supplies and label application are controlled for "out of plant" drumming were discussed. This would include drumming at processors and contract drummers, and bulk container labeling at contract terminals.

S&T will develop procedures and guidelines to assure the above.

6. Based on our experience with the VCM warning label on PVC bags concern has been expressed regarding the potential impact of the additional product labeling on exports.

Based on Legal review, there appears to be no regulatory conflicts with labeling requirements international transportation regulations. However, we should consider communicating the new labeling requirements to our identifiable foreign customers to avoid potential shipment problems.

7. Labeling of other than product containers leaving the plants that contain hazardous materials will have to be labeled. Plant procedures will have to be developed to assure that these containers are labeled.

Customer samples will also have to be labeled. The existing sample labels will have to be expanded. The 4"x4" bulk container tag format can probably be used.

ACTION ITEMS

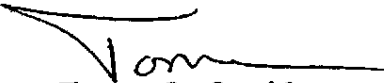
1. Darwin Phillips will work on sources and methods (tags, laminated labels, etc.) for bulk container labeling

Distribution
Page 3
July 12, 1985

2. Darwin Phillips will verify label adhesive compatibility for various drums and containers we use.
3. S&T will begin to develop quantities of labels needed for specific products being drummed.
4. Tom Grumbles will write the additional labels needed for bulk containers.
5. Tom Grumbles will get Bob Lamons final label copy for all required labels to allow the art work to be done.

It is understood that S&T will need approximately 60 days before the November 25 compliance date to implement the necessary procedures and assure drums in storage are labeled.

I will propose the next meeting date and a schedule for the action items in the near future.



Thomas G. Grumbles

ajo/007

Attachments

cc J. A. DeBernardi
F. Thomas
Safety Directors

Distribution:

R. R. Cooley
D. J. Corrigan
H. W. Hilgers
C. F. Putnik
R. M. Lamons
C. R. Miller
W. R. Parker
D. R. Phillips
T. S. Randolph
P. Carey

VEU-149329

JCL: TGG: RF
OSHA Labeling
Desk

TO: Distribution

FROM: Tom Grumbles
DATE: June 17, 1985

Interoffice
Communication

SUBJ: SUMMARY AND ACTION ITEMS: DRUM LABELING MEETING OF JUNE 11

VIST

The following items were decided at the subject meeting.

1. Drum Label Format: The label will be a "stick-on" label of some sort, preferably vinyl or other durable material. The empty drum hazard warning label will be incorporated on the general hazard warning label to avoid having to affix two labels to the drums. Legal advises that the empty drum hazard warning language should be placed on all drums, not just those containing OSHA hazardous materials.

Action Items:

1. Bob Lamons will work with Darwin Phillips to "mock-up" several label formats and begin to get cost estimates for the printing.
2. Tom Grumbles will give Bob Lamons the empty drum hazard language to be incorporated on the general label.
3. John Levardson will get quantity estimates for all products drummed.
2. Label Content: The hazard warning language proposed in my May 31 memo plus the empty drum language will be the basic label content. Single product or some type of combination product labels, with the appropriate label being indicated in some form, were discussed. These options will be considered in the cost estimates.
3. Labeling Logistics: It appears that labeling logistics at the LCCP will not be too difficult. However, we need to determine how to assure our products drummed out-of-plant (Evans, etc.) are labeled.

Action Item:

1. Betsy Meyer and Dave Corrigan will review out-of-plant drumming procedures to determine the best means to achieve the needed controls.

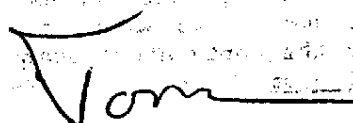
Many issues are left to be considered and resolved. The next meeting on drum labeling will be held July 9 at 9:00 a.m. in Conference room 2A. The following items should be considered for discussion at that meeting.

VEV-149333

Distribution
Page 2
June 17, 1985

1. Labeling of other product containers such as samples, portable tank containers and railcars.
2. Potential impact of OSHA required labels on export customers.
3. Label supplies: inventory control, distribution, purchase point, etc.
4. Labeling of materials outside of normal product lines (off-spec, samples, wastes, etc.)

Please contact me if you have questions on the above or have discussion items to add.


Thomas G. Grumbles.

ajo/007

cc J. A. DeBernardi, Dave Kuhn, Fred Thomas

Distribution:

R. R. Cooley ✓
D. J. Corrigan ✓
H. W. Hilgers
R. M. Lamons ✓
W. L. McClain ✓
B. R. Meyer
C. R. Miller ✓
~~W. R. Parker~~
D. R. Phillips ✓
C. F. Putnik
Tom Randolph ✓

Label Options

Recommend single product labels

Other Bulk CONTAINERS

Get WHMC opinion

Export Impact

① Check IMD, etc. for conflict statements

② Consider notification of customers