

TO: Randy Gantz

~~TGG: JOL~~ ERT: MJH: AJO: RF

YE 481

FROM: T. G. Grumbles

DATE: March 12, 1991

Interoffice
Communication

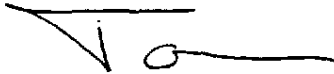
SUBJ: HAZARD COMMUNICATION INFORMATION ON FISHER SCIENTIFIC
BUFFER SOLUTION pH 4.0

VISTA

I finally received a response from Fisher on the concerns we had regarding the label and MSDS statements for formaldehyde.

The reply (attached) seems to say that formaldehyde is not a significant hazard but is mentioned on the label due to Pennsylvania's Right-to-Know labeling requirements.

Let me know if you need further information on this.



T. G. Grumbles

dlj

Attachment

VVV 000006117



**Fisher
Scientific**

Central Offices
711 Forbes Avenue
Pittsburgh, PA 15219-4785
(412) 562-8300

March 4, 1991

Thomas G. Grumble
Manager, Environmental Affairs
Vista Chemical Company
900 Threadneedle
Houston, TX 77079-2990

Dear Mr. Grumbles:

This letter is in response to your February 19 request regarding Buffer Solution pH 4.0 (SB98-20). Your January 10 letter was not forwarded to my attention. This product contains approximately 0.05% formaldehyde. OSHA's Hazard Communication Standard regulates the content of the MSDS. 29 CFR 1910.1200 (d)(5)(ii) discusses which components should appear on the MSDS. Carcinogens present at 0.1% or greater in a mixture need to be identified and discussed. As the formaldehyde content for SB98-20 is under 0.1%, there is no requirement to include it on the MSDS. However, our policy is to identify in the component section of the MSDS all known components. Pennsylvania's Worker and Community Right-to-Know Act requires that components which are considered special hazardous substances must be identified on the label if they are present at greater 0.01%. Formaldehyde is a special hazardous substance. As 0.05% meets this requirement, it is duly identified as such on the label. There is no discrepancy. This product contains approximately 99% water.

Regards,

D.K. Susa-Anderson, Manager
Toxicology and Chemical Information Products

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