

JJH: JCE: TGG: (RF)
XF: OSHA-1142 (OM)
STD.

TO: Ray DeYoung

FROM: T. G. Grumbles
DATE: October 31, 1984

Interoffice
Communication

SUBJ: MATERIAL SAFETY DATA SHEET DISTRIBUTION NEEDS: OSHA
COMPLIANCE

VISTA

This letter is to further describe the MSDS distribution needs to affect compliance with the OSHA Hazard Communication Standard. The distribution requirements of the standard are summarized below. The compliance date is November 25, 1985.

1. An applicable MSDS must be sent to manufacturing purchasers and distributors with the initial shipment after the effective date.
2. The MSDS shall be provided with the shipment itself, or sent to the purchaser prior to or at the time of the shipment.
3. If a MSDS is changed or updated with new health hazard information, the revised sheet must be sent with the first shipment after the revision.

As we have discussed, the mechanics of complying with the above requirements are beyond the resources of this department. Utilizing existing customer data systems, COEDS in particular, with necessary modifications to generate mailing lists, and existing hardware capabilities in word processing to print labels and customer letters appears feasible.

Following are my specific needs.

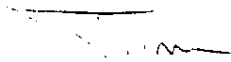
1. Production of a customer list, product specific, with proper mailing addresses.
2. Capability to drop this data to word processing to allow for printing of customer cover letters and labels for mailing.
3. The above would be done "in-mass" annually to cover current customers.
4. Notification, at least weekly of new customers or new products to old customers, to allow appropriate MSDSs to be sent between annual mailings.
5. Capability to generate a product specific customer list in the event that a MSDS is revised and must be redistributed.

I would like to have the above accomplished by September 1 of next year to assure timely delivery of MSDSs. Specifics of the

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program, i.e., letter content, "ship-to notification", etc., will be described as I understand them in another memo.


Thomas G. Grumbles

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cc Ken Eggers, Charlie Sanderson, Dave Kuhn

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