

HAZARD COMMUNICATION LABELING GUIDELINES

The Hazard Communication Standard requires chemical manufacturers to label hazardous chemicals found in the workplace and leaving the workplace. It is the responsibility of each department to be sure containers in that area are properly labeled. Any questions on labeling should be directed to Safety/Industrial Hygiene. Responsibility for labeling containers leaving the plant lies with the Shipping Department. The Corporate labeling group specifies the wording on labels for containers leaving Texas City. The following guidelines outline our labeling compliance at Texas City.

Materials in the Workplace1. Process Equipment (i.e., vessels, tanks, pumps, exchangers)

Each piece of process equipment has a functional item number stenciled on it. This number can be cross referenced on the container I.D. table to determine the hazardous materials contained within. The table for this unit is found in the section of this manual labeled "Container I.D. Table". The hazardous materials in this table are listed by their Material Safety Data Sheet (MSDS) names. The MSDS's for hazardous materials in this unit are found elsewhere in the manual.

2. Piping

Each pipeline can be traced to the nearest piece of process equipment. This equipment item can be cross referenced on that unit's Container I.D. Table, as described above.

3. Containers in the Workplace (i.e., drums, bags containing chemicals, bottles, aerosol cans)

Each container must have the following information on it:

● Identity of the Contained Hazardous Material

The chemical should be stated as it would be found on a MSDS.

● Appropriate Hazard Warnings

Acceptable hazard warnings include Corrosive, Explosive, Carcinogen, Compressed Gas, Irritant, Sensitizer, Toxic, Oxidizer, Water Reactive, Pyrophoric, target organ effects.

LAM005199

Materials in the Workplace (Cont'd.)

Warnings NOT acceptable include: "Harmful if Swallowed" and "Hazardous Material", because these statements do not adequately describe the hazard of the material.

Existing labels on incoming containers of hazardous chemicals should NOT be removed unless the container is immediately relabeled with the required information.

4. Exceptions:

- Portable Containers such as buckets, catch pans and beakers are exempted from labeling requirements if the contents are for the immediate use of the employee who performs the transfer.
- Laboratory Chemicals. Labels on incoming containers of hazardous chemicals shall not be removed or defaced. All laboratory storage containers, such as volumetric flasks, must be labeled as to the contents, using the name as stated on a MSDS. In cases where containers are too small to be labeled with the MSDS name, formulas or other abbreviations are acceptable if a placard stating the abbreviation and MSDS name is posted at the work station. This placard will allow a person unfamiliar with the work area to access the appropriate MSDS.
- Unit Samples Carried to Q.A. Laboratory. Routine samples will be carried to the laboratory, labeled by either the chemical name (as found on a MSDS), the ALIS (Automated Laboratory Information System) name, or occasionally the functional item number of the equipment from which it was sampled. Samples labeled by equipment number may be cross referenced using the Container I.D. Table found in the Hazard Communication manual. (The Q.A. laboratory manuals have a Container I.D. Table for every area of the Texas City plant.) Each unit's labeling exceptions and use of portable containers will be documented in the Hazard Communication manual for that area.

Materials Leaving the Workplace

Materials leaving the Texas City plant must be labeled with the following:

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LAM005200

Materials Leaving the Workplace (Cont'd.)

1. Identity of the Contained Hazardous Material

The chemical name should be stated as it would be found on a MSDS.

2. Appropriate Hazard Warnings

The requirements previously described apply to materials in the workplace and materials leaving the workplace.

3. Name and Address of the chemical manufacturer or other responsible person.

4. Monsanto's telephone number (314/694-1000) and CAS Number

Also, the hazard warning must be approved by the Corporate Distribution Labeling section. NOTE: These two items are required by Monsanto, but not by the Hazard Communication Standard.

The above requirements apply primarily to laboratory samples and special drum samples that are shipped out of Texas City for experimental purposes.

Exceptions:

Materials shipped out by barge, railroad car, or tank truck are not covered by the Hazard Communication Standard, as DOT regulations cover these forms of transportation.

Hazardous wastes covered under RCRA (Resource Conservation and Recovery Act), Part B, are also exempted.

Products covered under other regulations, such as the Food, Drug and Cosmetic Act; Federal Insecticide, Fungicide and Rodenticide Act; Federal Alcohol Administration Act; Consumer Product Safety Act; are exempted by the Hazard Communication Standard.

SC 003992

LAM005201

SAMPLE LABELING

TERTIARY BUTYLAMINE, ACETALDEHYDE, AND
ISOBUTYLENE USE THIS SAMPLE LABEL

MT-19 10M 1-83 C&C

MONSANTO COMPANY
TEXAS CITY, TEXAS

SAMPLE OF _____

DATE _____ TIME _____

ANALYSIS _____ REGULAR ☐

SAMPLED BY _____

UNIT NO. _____

REPORT TO _____

1

SODIUM HYDROXIDE USES THIS SAMPLE LABEL

MT-19 6M 2-84 C&C

MONSANTO COMPANY
TEXAS CITY, TEXAS

SAMPLE OF _____

DATE _____ TIME _____

ANALYSIS _____ REGULAR ☐

SAMPLED BY _____

UNIT NO. _____

REPORT TO _____

2

SC

003993

CAUSTIC

LAM005202

SAMPLE LABELING

ACETONE CYANOHYDRIN, HYDROGEN CYANIDE AND
LACTONITRILE USE THIS SAMPLE LABEL

MT-19 6M 8-45 C&C

MONSANTO COMPANY
TEXAS CITY, TEXAS

SAMPLE OF _____

DATE _____ TIME _____

ANALYSIS _____ REGULAR ☐

SAMPLED BY _____

UNIT NO. _____

REPORT TO _____

13

PHOSPHORIC ACID AND SULFURIC ACID USE
THIS SAMPLE LABEL.

MONSANTO COMPANY
TEXAS CITY, TEXAS

DATE _____ TIME _____

SAMPLED BY _____

UNIT NO. _____

REPORT TO _____

9

SC

003994

LAM005203