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Interoffice Communication

To J. R. Bowden - Stamford
From J. J. Hall
Date April 16, 1981
Subject CMA POSITIONS ON OSHA PROPOSALS

In general we have no quarrel with the CMA positions as outlined. All except pesticides, conveyors and marine terminals will impact Conoco Chemicals. I will comment on some of the proposals and send a copy of this to our Safety Directors who may want to comment on the safety-related proposals.

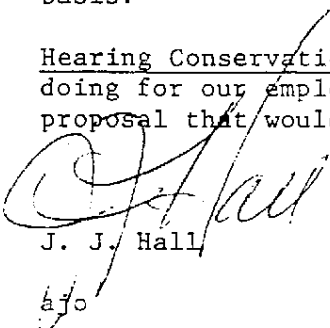
Hazards Identification - This proposal as written would have been tremendously burdensome to us with little benefit. It was a classic case of good intentions but bad implementation due to ignorance. A chemical plant would have looked like a billboard and all labels would have lost their value. We should support CMA's efforts to work toward an effective and reasonable alternative.

Cancer Policy - This standard is still in limbo and could be troublesome. The American Industrial Health Council (AIHC) is taking the lead on this one and we support their efforts.

Hazardous Materials - Major changes to this part of the OSHA regulation would be time consuming and have little positive impact. We should spend our efforts elsewhere.

Confined Space Entry - We support a well-thought-out performance standard in this area. Standards should be developed on an industry-by-industry basis.

Hearing Conservation - Overall this proposal reflects what we are already doing for our employees. There are some technical complications in the proposal that would be burdensome but not add to our program.


J. J. Hall

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cc Safety Directors
Michele Malloy

SAL 000078643