

Vista Chemical Company

15990 N. Barker's Landing Rd.
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

IGG: ~~121~~: ~~QMG~~: RF

XF: Cust. Response

December 27, 1985

VISTA

Wanda Macisaac
Molecular Biotech
139 Main Street
Cambridge, MA 02142

Dear Wanda:

Per our discussion, enclosed is a Material Safety Data Sheet for Vista ALFOL 12 Alcohol. The toxicity data is listed in Section 5. Also, the NIOSH Registry of Toxic Effects of Chemical Substances 1983 Supplement has do-decyl alcohol listed on pages 678 and 679. The registry number for do-decyl alcohol is JR 5775000.

I have also enclosed a technical data sheet on Vista's alcohols. Please call me at 713-531-3445 if you have questions on the information enclosed.

Sincerely,


Thomas G. Grumbles, CIH
Environmental Quality Manager

bh

Enc.

VVV 000017480

Thomas G. Grumbles

VISTA

~~TCG:~~ JCL: ~~MDG:~~ RF

To VTAC Committee

Date 12/27

Enclosed is a final VTAC
Charter.

TGS

File: VTAC1

VVV 000017481

CHARTER

VISTA CHEMICAL TOXICOLOGY ASSESSMENT COMMITTEE

Functions

1. Review toxicological testing needs for Vista products and recommend appropriate testing.
2. Select, audit, and monitor contract testing laboratories to assure testing is done in a cost effective, timely manner according to applicable regulatory procedures and professional standards.
3. Review new or modified products to determine if a pre-manufacture notification is required under the Toxic Substance Control Act.
4. Review customer requests for test data and formulate appropriate responses.
5. Monitor scientific literature and communicate new toxicity or health effect information for products produced or used by Vista.

Membership

T. G. Grumbles - Environmental Quality Manager - Chairman
O. C. Kerfoot - Director, Chemicals Technical Service
Alan Nielsen - Senior Research Micro-Biologist
Bill McClain - Attorney, Environmental and Biomedical
Affairs Department

Additional members, such as the Vista Medical Manager or toxicology consultants will be included on an ad-hoc basis.

Meeting Dates

The committee shall meet quarterly. Other meetings will be scheduled when necessary.

Records

A written record of all proceedings will be kept. This record will include, but not be limited to agendas, meeting minutes and support documents.

A summary report of all testing done by Vista will be kept at the R&D facility and in the Biomedical and Environmental Affairs Department.

VVV 000017482

Thomas G. Grumble TGG: ~~DEL~~ MMG: (RF) VISTA

XF: ~~HAZ MAT TRANS~~

To

Safety Directors

Paul Cowan

Debra Gumbert

Date 12/27

fyi.

VVV 000017483

CHEMNET extends transport safety

CHEMNET — the industry's mutual aid system for transportation emergencies — got on track November 1.

It is the third element of the new National Chemical Response and Information Center (NCRIC) to go into place. Expanded programs for CHEMTREC and first responder training recently went into service. A final initiative, a Chemical Referral Center (CRC) is scheduled to start in December to provide the public with basic information about chemicals.

CHEMNET is an outgrowth of CHEMTREC's service that provides information to emergency crews responding to a transportation incident involving chemicals.

Going one step further, CHEMNET is a mutual aid network between shippers that will speed emergency responders to the scene of serious chemical distribution accidents. They will act as advisors and offer hands-on aid only if requested by the official in charge.

The network will be activated when a member shipper cannot respond promptly to a problem involving his chemical that requires the presence of a chemical expert.

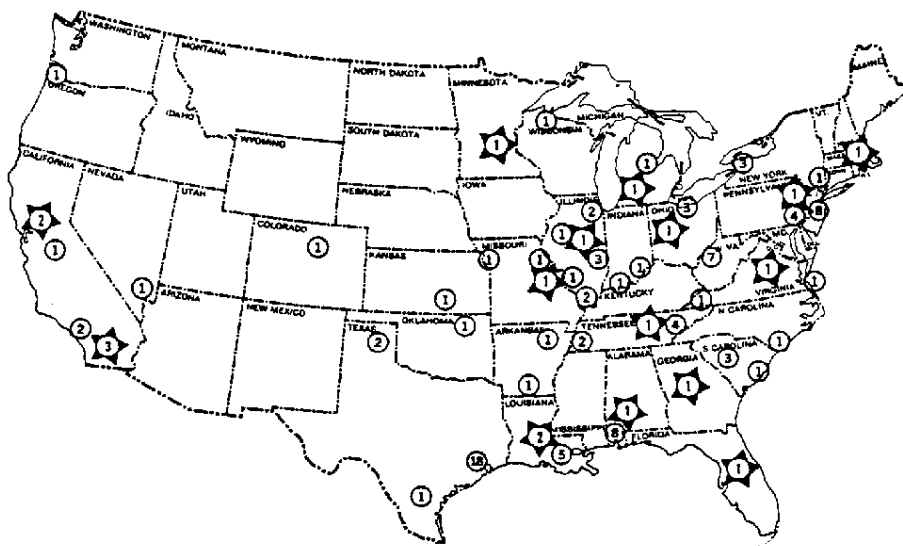
The shipper would then activate CHEMNET, which would contact a nearby chemical company response team to go to the scene.

At startup, 55 companies were members of CHEMNET and another 10 companies are expected to join shortly. Network members have committed 100 emergency response teams to the system.

In areas where the chemical industry can't respond quickly, CHEMNET will rely on for-hire emergency response contractors. Two such companies with 20 teams have already agreed to help, and several more are expected to join the system soon.

Mayhew, director of the National Chemical Response and Information Center, said that overall, the response teams "are distributed geographically where the industry is concentrated,

The CHEMNET system at startup



This map shows where CHEMNET is presently operating. Dots denote the locations of member company response teams. Stars signify where for-hire cleanup contractors are stationed. Circled numbers are the number of emergency response teams in the general area.

and that's where most accidents occur."

The Rocky Mountain and upper plains states are "the only real areas where we need more teams," Mr. Mayhew said, predicting that "we'll pick up more teams quickly."

The startup date for CRC may come around Christmas, Mr. Mayhew said. Chemical companies presently are busy complying with the federal hazard communication standard that goes into effect November 25.

After that deadline has passed, the 97 companies that have joined CRC should be able to provide the center the index of their products needed for reference files. "Only a few companies have sent this information to CRC so far," Mr. Mayhew noted.

He expects an "information crunch"

to hit the center around the first week in December. Some companies are providing data tapes that are compatible with CMA's IBM 36 computer. "That will speed things considerably," he said.

The only sticky point he sees in operating the new center is in referring callers to companies. The initial call to the center is toll free. "And many companies have set up toll-free lines to get referral calls,"

Noting that some members have not taken that step, he emphasized that it needs to be done "to complete the loop." Otherwise, he said, "the public will be turned off."

Enrollment is still open for both CRC and CHEMNET, and Mr. Mayhew urged members to join "for the benefit of the entire industry. □

VVV 000017485

File copy

GC MSR
RDS

1 JDS

fy?

Plant Managers
Date 12/87

Thomas G. Grumbles
Xf: ~~ND~~
TGG: ~~MMG: RF~~
VISTA

SPECIAL REPORT

How To Deal With The Media

Neither wind, rain, sleet, nor snow can keep the news media's interest from your wastewater treatment plant door in the event of an "unfortunate" incident. Public knowledge and awareness of the world we live in has increased and now, a crisis means instant media attention.

According to Christine C. Bott and Thomas E. Decker, authors of a paper presented at the Water Pollution Control Federation's annual conference, treatment plant managers must know how to deal with the media. Crisis communications has come of age and the public's heightened awareness and interest has extended into the environmental and pollution control area. A derailed train spilling acid into a stream or a chemical plant accident that spews a toxic cloud into the air become prime time and front-page national news, the authors warn.

Whatever Can Go Wrong, Will

If you think that it's the other guy's problems that come under the scrutiny of the news media—think twice. It doesn't take a major disaster to get the attention of your local media. Just see what happens with a sewer collapse, a plant bypass, or a treatment chemical leak or spill at your facility. Bott and Decker say that the media will be probing for answers and insisting on the facts before you can say "biochemical oxygen demand."

Crises have a way of happening, even in the best operated and maintained wastewater collection and treatment systems. You must be ready to deal with such an occurrence by planning for it and reacting properly.

Crisis communication planning and response may seem like a huge waste of time if you never have to use the plan. But just think how nice it would be if you already had a written, workable plan in place in case you did need it. What does the plan provide? It provides you with a framework and a set of procedures for helping you and your treatment plant staff deal with every conceivable and sudden stroke of ill fortune.

The big question is how to develop a plan for catastrophe. The first step is to develop the base for successful planning. This means developing a policy. You will have to emphasize communications all year round—not wait until a crisis occurs. You should keep the public informed, including the media, in order to develop and enforce your credibility.

During a crisis, **communicate**. Silence breeds suspicion, or encourages indifference, the authors say. It seldom wins understanding, sympathy, or support.

Be prepared for every conceivable disaster. In other words, have a communications plan. The plan should be specific, updated regularly, practiced, and communicated to everyone in your facility.

Where To Start

Initial development of the plan must begin at the top of your organization. As the person in charge of the entire utility, you should appoint a committee to prepare the plan. Bott and Decker suggest that this committee be composed of individuals who are thoroughly knowledgeable about all aspects of the characteristics and operations of the various facilities because they will be best equipped to ensure that all possible eventualities and ramifications have been covered.

You should designate a spokesperson for your facility. This person should be someone in upper management who is cool under fire, thinks quickly, and is a good speaker. The authors suggest the director or the general manager as two good choices. On the other hand, some larger utilities choose their professional communicator or public relations officer. It all depends on the size of your facility. In larger facilities, this person usually is kept free for speech writing, fact findings, and news release preparation.

Crisis Response

Your plan is set, you've covered everything, and, with any luck, you'll never have to use it. But just for a moment, let's pretend that all's not well with your wastewater treatment plant, and a crisis occurs.

Quickly, you spring into action. When a disaster situation develops, the best advice to take may be that of Bott and Decker:

- ▶ Reduce confusion, panic, and misunderstandings;
- ▶ Present a united front;
- ▶ Eliminate hearsay and rumors;
- ▶ Increase potential for balanced news media coverage;

- ▶ Establish credibility and honesty.

There are several simultaneous activities that you must deal with the instant a crisis occurs:

- ▶ Assemble the response team and the spokesperson that you have already identified in your plan;
- ▶ Attend to the health and safety of employees as well as the community as a whole. Inform the families of any affected staff members;
- ▶ Notify top utility management;
- ▶ Notify the media of the occurrence;
- ▶ Obtain all pertinent facts about the situation and determine the positive aspects;
- ▶ Prepare a formal statement;
- ▶ Start a log of responses and actions related to the crisis.

Remember, it's hard enough to gather information under ordinary circumstances, let alone in a crisis. Obtain the correct information and disseminate it.

Be prepared to answer questions about the monetary estimate of damages, time frames for when you will resume normal operations, and the possibility of threats to life or safety—information that will in all probability have been given to the emergency response officials to help them in their duties. Discuss with these officials in advance how, when, and by whom this information will be released to the media.

Thomas G. Grumbles

~~TOG:~~ JCL: ~~MMG:~~ RF

VISTA

XF: NONE

To Jim Carter.
Bill McClain
Tom Hoffman
Jim Debernardi
John Friend

Date 12/67

fyi

This article describes a recent court
decision allowing union hygienists plant
access.

TJR

VVV 000017487

That is not entirely new, of course, but the Office of Technology Assessment (OTA), a branch of Congress, has issued a report emphasizing the importance of doing more to protect both women and men as well as the fetus.

OTA found that evidence linking specific agents with reproductive or developmental effects in humans is, for the most part, inconclusive. However, four hazards are now regulated in part because of their known effects on adult reproductive capacity or embryo development. They are ionizing radiation, lead, ethylene oxide and dibromochloropropane (DBCP).

Among the factors complicating the study of reproductive health hazards, according to OTA, are individual variations in susceptibility to suspected agents, difficulties in extrapolating information from animal studies, incomplete data on the agents, their possible toxic effects and the number of workers exposed. Many of the studies have been evaluated only in men, women or offspring, but not in all three.

UNIONS WIN RIGHT TO HAVE OWN HYGIENIST AS MONITOR:

The U.S. Court of Appeals in Boston has upheld the right of a union to have its own industrial hygienist measure noise levels in a workplace.

The National Labor Relations Board last January ruled that a union's request for access to a workplace in order to carry out its representation function should not be considered the same as a request for information needed for bargaining.

Instead, NLRB adopted a more restrictive policy favoring the employer's interest in excluding "outsiders" from company property.

Even so, NLRB found that the Holyoke (Mass.) Water Power Co. had violated federal labor law by denying Electrical Workers Local 455 the right to have an industrial hygienist of its choice measure the noise levels in a fan room where the company had provided personal protective devices to workers who maintained and repaired the equipment.

The company challenged the NLRB order in the 1st U.S. Circuit Court of Appeals in Boston. The AFL-CIO filed a brief to argue the union's right to relevant data.

A three-judge panel of the court agreed that the company was required to grant the union hygienist access to the fan room and noted that the information sought was clearly relevant to collective bargaining. At the same time, the judges said NLRB had "reached the same result by a different route."

The court also noted that OSHA's issuance of a noise standard did not make the requested information irrelevant, adding: "The union is entitled to bargain for a standard that exceeds the one established by OSHA."

CORPORATE SAFETY DIRECTOR JAILED FOR LYING TO OSHA:

Carl MacPetrie, safety director for GTE-Valeron Corp., has been sentenced to three months in jail and fined \$10,000 for lying to an OSHA inspector during a September 1981 visit to the company's tungsten carbide tool manufacturing facility in Syracuse, NY.

He pleaded guilty in his appearance before the U.S. District Court for the Northern District of New York. In addition to the three-month jail term, he was fined \$10,000. He may appeal the sentence.

OSHA said it was believed to be the first jail term and fine for this type of offense. Under the Occupational Safety & Health Act of 1970, anyone who "knowingly makes a false statement, representation or certification" to OSHA is liable for a fine of up to six months in jail and/or a fine of up to \$10,000.

According to the charges filed against him, MacPetrie informed an OSHA inspector that a "rough cut saw" used to grind tools was down for repairs. In fact, the saw had been disabled at his direction to prevent the OSHA compliance officer from obtaining an accurate reading on worker exposure to cobalt and other dust emitted during machine operation.

"We expect good faith on the part of employers in preventing occupational injury

Thomas G. Grumbles

TGG:

~~ML~~

MMG:

(RF)

VISTA

XF:

None

To Safety Directors

Date 10/27

Environmental Directors

Enclosed article describes various
criminal prosecution actions by OSHA
and EPA.

TJB

cc Bill McClain

VVV 000017489

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"We expect good faith on the part of employers in preventing occupational injury

and illness, and we're willing to work with those who demonstrate that good faith to correct any problems in their workplaces," said Acting Assistant Secretary of Labor Patrick R. Tyson.

"But those few employers who callously assume that OSHA will ignore deception and lies and blatant disregard for the welfare of workers would do well to reconsider their approach."

More evidence that a crackdown against violators of occupational and environmental laws came in an indictment of the owner of four chemical waste disposal firms on charges of criminal mishandling of toxic waste, including three counts of placing employees in danger of serious injury "through conduct showing an extreme indifference for human life."

It was the first major case in which the government has brought criminal charges under the "knowing endangerment section" of the Resource Conservation and Recovery Act of 1980.

The indictment was returned against Arthur J. Greer, 48, of Orlando, FL. His companies are City Industries, Inc., City Chemicals Company, Inc., City Environmental Services, Inc., and Recovery of America Corp., all of Orlando.

Greer caused employees "to become ill by having them sniff samples from drums of various wastes to determine the content of the drums, rather than performing the chemical analyses required for this purpose," said the indictment.

In addition, Greer caused employees "to determine the ignitability of various wastes by placing samples thereof in soft drink cans and placing lighted matches in these cans," the indictment said. Moreover, it added that clothing was burned off an employee when he used a forklift to pick up a deteriorated drum containing waste.

That's not all. He was charged with mail fraud for allegedly cheating customers who contracted with his firms for waste disposal, operating without a federal permit and, finally, submitting fraudulent claims against the federal government for cleanup and disposal of chemicals.

If convicted on all counts, he faces a maximum penalty of 12 years in prison and a \$310,000 fine.

Note: A little-known Criminal Fine Enforcement Act of 1984 greatly increases the monetary penalties which can be imposed on companies willfully violating environmental and occupational laws. For example, an employer who willfully caused a worker's death by violating a standard enforced by OSHA could be fined \$500,000 and interest. Under the old law, the limit for a criminal fine would have been \$10,000 with no interest.

U OF MASS. GETS OCCUPATIONAL HEALTH GRANT FROM KELLOGG:

The University of Massachusetts Medical Center in Worcester has received a three-year \$396,138 grant from the W.K. Kellogg Foundation of Battle Creek, MI, to develop an educational program to improve health and safety in the workplace.

The grant will enable the university's occupational health program, a division of the Department of Family and Community Medicine, to establish three projects aimed at increasing the knowledge and skills of health professionals from varied disciplines to improve recognition and prevention of work-related injuries and illnesses and to improve workplace health and safety.

The three projects are: a one-year, clinically oriented residency training program in occupational medicine; a three-week intensive institute in occupational health and safety; and a two-month student training and placement program in occupational health and safety.

The residency program will train eight physicians in various aspects of occupational medicine over the next three years. The institute, to be called the New England Occupational Health and Safety Institute, will be held annually starting next June, when a series of six courses will be presented.

The student training and placement program will begin next July, with 14 medical, nursing, public health and other students participating over the next two

TGS: ~~CL~~: MMG: RF
XF: NONE

December 27, 1985

VISTA

Dean Hill, Chief
Pesticides and Toxic Substances Branch
EPA, NEIC
Bldg. 53, Box 25227
Denver Federal Center
Denver, CO 80225

Dear Mr. Hill:

I spoke with Bill Palmer, of your staff, today regarding your request for a copy of Vista's surface active agents catalogue. Currently, Vista does not have a single document describing our products that fall in that category.

As I understand your needs, your group is trying to build a data base to better understand trade names and chemical constituents of end-use products you encounter during TSCA investigations. I have enclosed 5 technical data sheets describing our products that could be used as surface active agents in some applications.

Please feel free to call me if you have questions regarding this information.

Sincerely,



Thomas G. Grumbles, CIH
Environmental Quality Manager

bh

Enc.

VVV 000017492

Thomas G. Grumbles

TGG: JGL: MNG: RF
XFOSHA

VISTA

To Distribution

Date 12/27

The carcinogenic oil labeling
Requirements battle is heating
up. This article describes
recent lawsuit against OSHA
Regarding those Requirements.

Distribution:

Pat Jeenigan

Maryl Valenta

Pat Quinlan

John Nelson

J. A. HALL

Dan Plummer

Joe Nigro

Rick Tuttle

File Copy:

OSHA HAZ. com.

VVV 000017493



Current Report

Right-to-Know

SMALL OIL REFINERIES SUE OSHA CLAIMING AMBIGUITIES IN STANDARD

Three small independent oil refineries asked a federal court in Washington, D.C., Dec. 6 to stop the Occupational Safety and Health Administration from enforcing the hazard communication standard as it pertains to lubricating oil because of ambiguities concerning which oils are carcinogens.

OSHA violated the Administrative Procedure Act by failing to "clarify, interpret or modify the standard," which became effective Nov. 25, "to provide a definition of the distinction between mild and severe hydrotreating in the refining and processing of lubricating oil," according to the suit, *Calumet Industries, Inc., et al. v. William Brock, et al.* (No. 85-3889), filed in the U.S. District Court for the District of Columbia.

In addition to Calumet, a Chicago, Ill., oil company with a refinery in Princeton, La., the suit was filed on behalf of Macmillan Ring-Free Oil Co., Inc., New York, N.Y.; and Seaview Petroleum, Inc., a company located in Blue Bell, Pa., with a refinery in Paulsboro, N.J. The three were characterized in their request for preliminary injunction as "relatively small in size."

Joseph Woodward, counsel for appellate litigation at OSHA, told BNA Dec. 10 that he had received a copy of the suit the day before, and had just assigned it to an attorney.

The oil companies asked U.S. District Judge Charles R. Richey to order OSHA to respond to their request for documents and to answer their first set of questions by Dec. 16, although a defendant normally would be given 45 days to respond. The expedited request is being pursued by the companies in order to "alleviate the irreparable injury they are suffering from OSHA's arbitrary and capricious action," according to the suit.

The small companies are "losing substantial sales" because some oil purchasers, such as General Motors, will only buy oils that do not require a label, Calumet wrote to OSHA prior to filing the suit. To change its process, Calumet would have to spend \$22 million to \$25 million, and still would not be certain that the new procedures for treatment would produce non-carcinogenic products, the company continued.

Raymond Wright, executive vice president, Seaview, also wrote to OSHA stating that his company is reluctant to spend money on further processing techniques "because of the likelihood of animal testing establishing the fact that all naphthenic lubricants are potentially carcinogenic."

No Undue Burden

OSHA will "not be unduly burdened" by the expedited request since officials have recently held meetings on the standard, the suit related.

The companies noted that a chemical is considered to be a carcinogen under the standard if it "has been evaluated by the International Agency for Research on Cancer and found to be a carcinogen or potential carcinogen." IARC concluded that mildly hydrotreated oils are carcinogenic to animals, but for those that are severely treated the data are inadequate to permit an evaluation of their carcinogenicity

(Current Report, Nov. 21, p. 509). Consequently, only those oils which have undergone mild hydrotreating need to be labeled as carcinogenic.

IARC does not "provide a clear definitional distinction between mild and severe hydrotreating," the plaintiffs contended. Because of this, some of the major oil companies, such as Exxon and Shell, have "taken unfair advantage of the ambiguities" by relying on their own "proprietary" test results to characterize their "processes as severe hydrotreating," when in fact the processes are mild hydrotreating, they continued. Thus, the firms are being allowed to engage in "private rulemaking" in order to avoid the Standard's labeling requirements," they added.

In addition, the suit alleged, employees of those firms "avoiding the labeling requirements, will be adversely affected."

Although OSHA is aware of the problems, it has not issued a notice in the *Federal Register* distinguishing between the two forms of treatment, "so as to determine whether other manufacturers purporting to be exempt from the standard must in fact comply," the suit declared.

OSHA "may, in fact, be conducting itself in accordance with a policy that, absent a specific budget allocation to support an interpretative rulemaking process, it will refrain from conducting rulemaking to clarify the standard until ordered to do so by a court," the companies contended.

Following a Nov. 7 meeting with the oil companies, agency officials had predicted that a notice would be published before the Nov. 25 effective date of the standard.

An OSHA health standards official told BNA Dec. 10 that the agency held an internal meeting on the issue Dec. 6, and is still considering a *Federal Register* notice. OSHA will make a final decision concerning its course of action within a week, and will then make an announcement, he said.

Cotton Dust

REVISED COTTON DUST STANDARD ANNOUNCED; MEDICAL SURVEILLANCE REQUIREMENTS RELAXED

The Occupational Safety and Health Administration Dec. 5 announced final revisions to its cotton dust standard which relax the medical surveillance and exposure monitoring requirements of the rule, but restore wage retention protection for workers who must be removed from cotton dust exposure.

The revised rule is tentatively scheduled for publication in the *Federal Register* Dec. 13.

The standard reflects joint recommendations made by the Amalgamated Clothing and Textile Workers Union and the American Textile Manufacturers Institute, the agency reported. "A commitment to worker safety and real cooperation between labor, industry and government made these revisions possible," Secretary of Labor William E. Brock stated in announcing the regulatory action.

The new standard, Brock said, will be more cost effective, more performance-oriented, and will "guarantee the necessary protections for more than 170,000 workers in the textile and non-textile industries."

TGS: ~~101~~ ~~1112~~ RF

XF: ~~101~~

new file-ST&S
manual

TO: Don Wharry
FROM: Tom Grumbles
DATE: December 20, 1985
SUBJECT: ST&S MANUAL - LABELING SECTION

Interoffice
Communication

VISTA

I would propose the following format for the labeling sections of the manual.

- I) Introduction (draft attached)
- II) List of products needing labels (attached)
- III) Actual copies of some typical labels: this would include drum labels for typical products; i.e., several alcohols, ethoxylates, industrials, etc., and the same for sample and bulk labels.
- IV) As part of III above, basic labeling instructions.

Below is the proposed introduction.

This section contains a list of VISTA products that must be labeled according to the OSHA Hazard Communication Standard, 29 CFR 1910.1200, and samples of those labels. These labeling requirements should not be confused with DOT labeling and placarding requirements found in 49 CFR. The OSHA standard requires labeling of all chemicals which present physical or health hazards. The OSHA health hazard definition is very broad. Therefore, many Vista products that are not hazardous by DOT definition are OSHA defined hazardous materials and must be labeled accordingly.

OSHA labels must be applied to all containers, regardless of size. Labels have been developed for drums, samples, and bulk containers (i.e., railcars and tank trucks). Samples of these labels are included in this section.

All questions regarding labeling requirements or content should be directed to Biomedical and Environmental Affairs in Houston.

As part of each label sample section we should put a brief description of the label application procedure. For example:

Drum labels are 8½ x 11, self-adhesive peel-off back. Two labels per drum should be applied, one on each side.

Instructions (attached) will be used.

VVV 000017495

Don Wharry
December 20, 1985
Page 2

Please call when you have reviewed this so we can discuss development of the labeling section.

T.G. Grumbles/mmg
T. G. Grumbles

bh

Att.

cc: O. C. Kerfoot

VVV 000017496

OSHA DEFINED HAZARDOUS MATERIALS

<u>PLANT AND HAZARDOUS MATERIAL</u>	<u>PRODUCT</u>		<u>LABEL AVAILABLE?</u>			<u>HAZARD(S)</u>
	<u>YES</u>	<u>NO</u>	<u>BULK</u>	<u>SAMPLE</u>	<u>DRUM</u>	
<u>ABERDEEN</u>						
None	-	-	-	-	-	--
<u>BALTIMORE</u>						
Aqueous Aluminum Chloride	x		x	x		Corrosive
Anhydrous Aluminum Chloride	x				x	Corrosive
Muriatic Acid	x		x	x		Corrosive
Spent Caustic	x		x			Corrosive
Spent Sulfuric Acid	x		x			Corrosive
<u>HAMMOND</u>						
SA-597 Sulfonic Acid	x		x	x		Corrosive
SA-697 Sulfonic Acid	x		x	x		Corrosive
C-550 Slurry	x		x	x		Irritant
C-560 Slurry	x		x	x		Irritant
C-640 Slurry	x		x	x		Combustible,Irritant
VMC-100	x		x	x		Irritant
ALFONIC 1412-A Ether Sulfate	x		x	x	x	Combustible,Irritant
ALFONIC 1412-S Ether Sulfate	x		x	x	x	Combustible,Irritant
<u>LAKE CHARLES LAB</u>						
C1011 Normal Paraffins	x		x	x		Combustible,Irritant
C1113 Normal Paraffins	x		x	x		Combustible,Irritant
C1416 Normal Paraffins	x		x	x		Irritant
C1214 Normal Paraffins	x			x		Irritant
C1216 Normal Paraffins	x			x		Irritant
Benzene		x		x		Flammable, Irritant, Human Carcinogen

WV 000017497

PLANT AND HAZARDOUS MATERIAL	PRODUCT YES NO	LABEL AVAILABLE?			HAZARD(S)
		BULK	SAMPLE	DRUM	
LAKE CHARLES CHEMICAL	x	x			Corrosive
	x	x			Flammable, Irritant
Methyl Chloride*	x	x			Flammable, Irritant, Animal Carcinogen
Butadiene Concentrate*	x	x			Flammable
Propane/Propylene*	x	x			Flammable, Irritant, Human Carcinogen
Light Aromatic Concentrate*	x	x			Combustible, Irritant
Kerosene	x			x	Combustible, Irritant
LPA Solvent	x	x	x		Combustible, Irritant
ODC Drilling Base Oil Fluid	x	x	x		Combustible, Irritant
MR Solvent	x	x	x		Combustible, Irritant
ODC-15	x	x			Combustible, Irritant
ALFOL 2 Alcohol	x	x	x		Flammable
ALFOL 4 Alcohol	x	x	x		Combustible, Irritant
ALFOL 6 Alcohol	x	x	x	x	Combustible, Irritant
ALFOL 8 Alcohol	x	x	x	x	Combustible, Irritant
ALFOL 8 HP Alcohol	x			x	Combustible, Irritant
ALFOL 10 Alcohol	x	x	x	x	Irritant
ALFOL 610 Alcohol	x	x	x	x	Combustible, Irritant
ALFOL 810 Alcohol	x	x	x	x	Combustible, Irritant
ALFOL 12 Alcohol	x	x	x	x	Irritant
ALFOL 14 Alcohol	x	x	x	x	Irritant
ALFOL 1012 Alcohol	x	x	x	x	Irritant
ALFOL 1014 Alcohol	x	x	x	x	Irritant
ALFOL 1214 Alcohol	x	x	x	x	Irritant
ALFOL 1214-GC Alcohol	x	x	x	x	Contact Irritant
ALFOL 1216 Alcohol	x	x	x	x	Contact Irritant
ALFOL 1216-CO Alcohol	x	x	x	x	Contact Irritant
ALFOL 1218 Alcohol	x	x	x	x	Contact Irritant
ALFOL 1412 Alcohol	x	x	x	x	Contact Irritant
ALFOL 1416 Alcohol	x	x	x	x	Contact Irritant
ALFOL 1418 Alcohol	x	x	x	x	Contact Irritant
ALFONIC By-Product Ethoxylate	x	x	x		Irritant
ALFONIC 610-50 Ethoxylate	x	x	x	x	Irritant
ALFONIC 610-60 Ethoxylate	x			x	Irritant
ALFONIC 810-40 Ethoxylate	x	x	x		Irritant
ALFONIC 810-60 Ethoxylate	x	x	x		Irritant
ALFONIC 1012-40 Ethoxylate	x	x	x		Contact Irritant
ALFONIC 1012-45 Ethoxylate	x	x	x		Contact Irritant
ALFONIC 1012-60 Ethoxylate	x	x	x	x	Contact Irritant
ALFONIC 1216-22 Ethoxylate	x	x	x	x	Irritant

VVV 000017498

PLANT AND HAZARDOUS MATERIAL LAKE CHARLES CHEMICAL (cont.)	PRODUCT		LABEL AVAILABLE?			HAZARD(S)
	YES	NO	BULK	SAMPLE	DRUM	
ALFONIC 1216-25 Ethoxylate	x		x	x		Irritant
ALFONIC 1216-30 Ethoxylate	x		x	x		Irritant
ALFONIC 1214GC-30 Ethoxylate	x		x	x		Irritant
ALFONIC 1214HA-30 Ethoxylate	x		x	x		Irritant
ALFONIC 1214GC-40 Ethoxylate	x		x	x		Irritant
ALFONIC 1412-40 Ethoxylate	x		x	x	x	Contact Irritant
ALFONIC 1412-60 Ethoxylate	x		x		x	Irritant
NOVEL 1412-70 Ethoxylate	x		x			Irritant
C1012 Normal Paraffins	x		x	x		Combustible, Irritant
C1216 Normal Paraffins	x		x	x		Contact Irritant
C1016 Normal Paraffins	x		x	x		Combustible, Irritant
<u>LAKE CHARLES VCM</u>						
Ethylene Dichloride*	x					Flammable, Irritant, Animal Carcinogen
Heavy Ends EDC/VCM*	x					Combustible, Irritant
Vinyl Chloride Light Ends*	x					Flammable, Irritant
Vinyl Chloride Monomer*	x					Flammable, Human Carcinogen
Muriatic Acid	x		x	x		Corrosive
<u>PONCA CITY</u>						
Alcohol Sulfates	x			x		Contact Irritant
Alkylbenzene Sodium Sulfates	x			x		Irritant
Alkylbenzene Sulfonic Acids	x			x		Corrosive
Dialkylbenzene Sodium Sulfates	x			x		Irritant
Diphenylalkane Sodium Sulfates	x			x		Irritant
Alcohol Ether Sulfates	x			x		Irritant
Alcohol Ethoxylates	x			x		Irritant
Alcohol Ethoxylates	x			x		Contact Irritant
LPA-140	x			x		Combustible, Irritant
LPA-180	x			x		Combustible, Irritant
LPA-190	x			x		Combustible, Irritant
LPA-210	x			x		Irritant

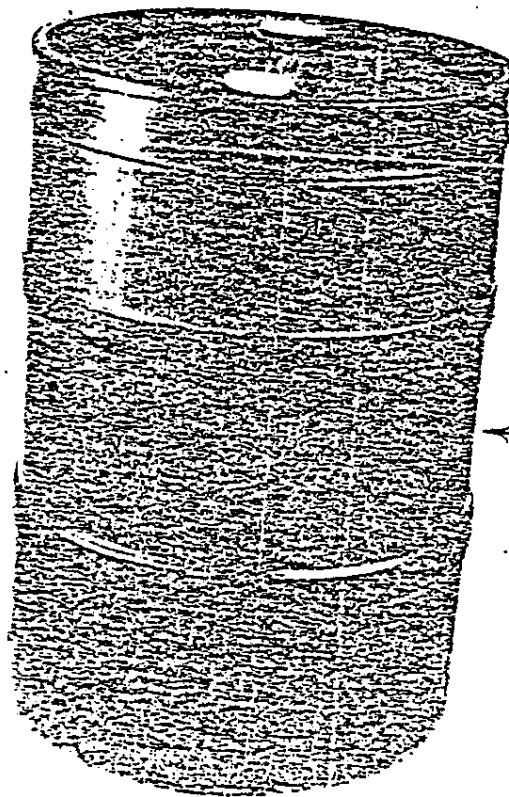
66410000 AAV 000017499

* Railcars containing these materials are in dedicated fleets and may have permanently affixed vinyl stickers on the inside of the rail car dome lid.

OSHA DEFINED HAZARDOUS MATERIALS

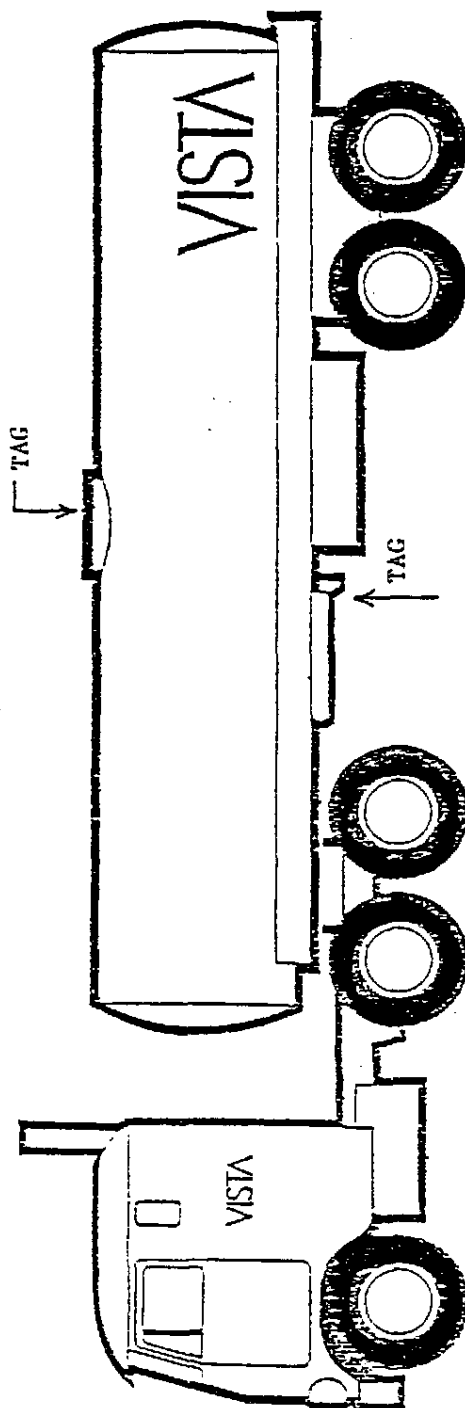
<u>PLANT AND HAZARDOUS MATERIAL</u>	<u>PRODUCT</u>		<u>LABEL AVAILABLE?</u>			<u>HAZARD (S)</u>
	<u>YES</u>	<u>NO</u>	<u>BULK</u>	<u>SAMPLE</u>	<u>DRUM</u>	
<u>ABERDEEN</u>						
None	-	-	-	-	-	--
<u>BALTIMORE</u>						
Aqueous Aluminum Chloride	x		x	x		Corrosive
Anhydrous Aluminum Chloride	x				x	Corrosive
Muriatic Acid	x		x	x		Corrosive
Spent Caustic	x		x			Corrosive
Spent Sulfuric Acid	x		x			Corrosive
<u>HAMMOND</u>						
SA-597 Sulfonic Acid	x		x	x		Corrosive
SA-697 Sulfonic Acid	x		x	x		Corrosive
C-550 Slurry	x		x	x		Irritant
C-560 Slurry	x		x	x		Irritant
C-640 Slurry	x		x	x		Combustible,Irritant
VMC-100	x		x	x		Irritant
ALFONIC 1412-A Ether Sulfate	x		x	x	x	Combustible,Irritant
ALFONIC 1412-S Ether Sulfate	x		x	x	x	Combustible,Irritant
<u>LAKE CHARLES LAB</u>						
C1011 Normal Paraffins	x		x	x		Combustible,Irritant
C1113 Normal Paraffins	x		x	x		Combustible,Irritant
C1416 Normal Paraffins	x		x	x		Irritant
C1214 Normal Paraffins	x			x		Irritant
C1216 Normal Paraffins	x			x		Irritant
Benzene		x		x		Flammable, Irritant, Human Carcinogen

VVV 0000 7500



← LABEL
(BOTH SIDES)

VVV 000017501



VVV 000017502

Sample of Bulk LABEL

VISTA CHEMICAL COMPANY

P. O. BOX 19029
15290 N. BARKER'S LANDING ROAD
HOUSTON, TEXAS 77224

VISTA

BUTADIENE CONCENTRATE

(1,3 BUTADIENE)

DANGER! EXTREMELY FLAMMABLE.

HARMFUL IF INHALED. HAS CAUSED CANCER IN LAB ANIMALS. OVEREXPOSURE MAY
CREATE CANCER RISK. KEEP AWAY FROM HEAT, SPARKS AND FLAME. AVOID
BREATHING VAPORS. USE WITH ADEQUATE VENTILATION.

FOR EMERGENCY ASSISTANCE, CALL

CHEMTREC 1-800-424-9300 OR VISTA 1-318-494-5142

VISTA CHEMICAL COMPANY

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15290 N. BARKER'S LANDING ROAD
HOUSTON, TEXAS 77224

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VWV 000017503