



Interoffice Communication

TO: Safety Directors
FROM: T. G. Grumbles
DATE: July 17, 1984
SUBJ: HAZARD DETERMINATION PROCEDURE

JVA
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AHS

Enclosed (Attachment 1) is a draft procedure for doing your hazard determinations in-plant. The following items should be noted when reviewing this procedure and implementing in-plant programs.

1. This procedure will be part of the overall "written" Hazard Communication Program.
2. The inventory list developed for hazardous materials must also be a part of the written program.
3. We will use the inventory list to determine the need for training program development, in particular, the opportunity for shared generic programs.
4. Labeling needs in-plant will be determined from this initial step. Therefore, it would be advisable when doing the inventories to also get brief descriptions of volumes and condition of use. I would recommend that unit and maintenance supervisory personnel be a part of this inventory effort.
5. Where necessary to do literature searches on chemicals, I can assist with resources available in Houston.
6. I have enclosed (Attachment 2) a proposed letter to be used when requesting a MSDS. The issue of purchasing policy will be addressed in a separate letter.
7. The OSHA requirements for MSDSs content are not in effect until November 1985. Our experience has been that many MSDSs currently in-plant will be inadequate in terms of those requirements as well as in general content. These MSDS will have to be revised by the manufacturer by November 1985, but we may have to do some revising and additions ourselves.
8. For your information a list of MSDSs available in Houston is enclosed (Attachment 3). These were obtained through Houston Purchasing.

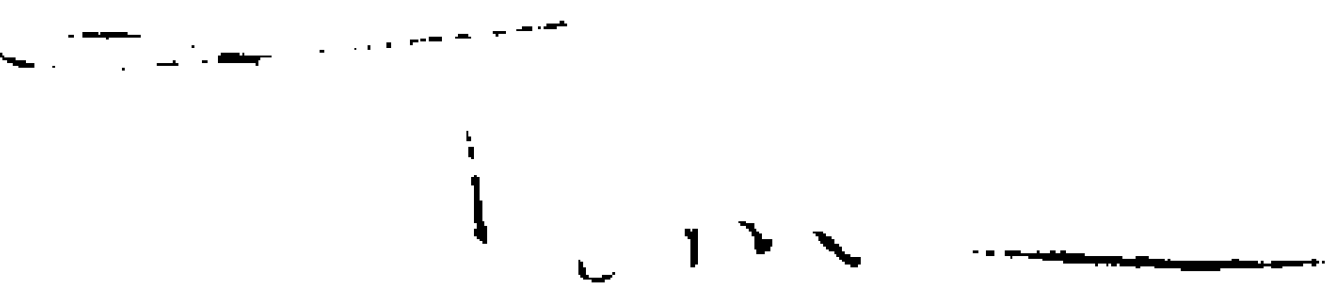
As we discussed, this hazard determination procedure will be the first step in a long list of items that need to be done for

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compliance with the Standard. I would suggest the hazard determination steps be done by September 15. Please send comments concerning the procedure back to me by August 6.


Thomas G. Grumbles

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Attachments

cc Dr. J. R. Drumwright
M. M. Malloy