

JV4

Please Respond
AHSAHS
Where do we stand on each
of the points mentioned below?
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TO: Gerald Uptain

FROM: Tom Grumbles
DATE: August 5, 1985Interoffice
Communication

SUBJ: PLANT HAZARD COMMUNICATION PROGRAM DEVELOPMENT

VISTA

Below are my comments regarding your labeling proposal for the hazard communication standard.

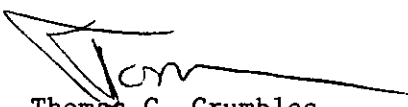
1. Process Vessels and Piping - as long as you are assured that all other containers in the general process areas will contain a vendors label that meets at least the minimum information requirements the proposed area labeling scheme appears acceptable.
2. Intermediate Storage Containers - In general I would recommend a sign larger than the $3\frac{1}{2} \times 4\frac{1}{2}$ inch signs proposed. Although there are no specifics in the standard as to size, I believe a larger sign would assure "readability" from a reasonable distance.

As we discussed, I haven't seen the text for these signs but it sounds as if they would meet the requirements of the standard.

Other comments regarding your hazard communication activities are summarized below.

1. Your summary of employer responsibilities should also have the following listed:
 - a. The hazard determination procedure used by the plant should be part of the written hazard communication program. This is described in Section d(6) of the standard.
 - b. This program must also be available, upon request, to employees and designated representatives.
2. It appears the plant is well ahead of the training requirements in the standard. However, keep in mind the continuing need to train new employees and contractors, when leasing programs for this purpose. In the long run a good, useful program may be well worth the purchase price versus leasing several times.

Based on our discussions, Aberdeen seems to be in pretty good shape in reaching compliance with the standard. Further details of the plant's progress can be discussed during my plant visit the week of August 26.


 Thomas G. Grumbles
 ajo/007

cc Al Sather, John Friend

