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October 9, 1974

VC1 - LABELING

The October 4, 1974 VCM regulation by OSHA states:

(1) Signs and labels

(1) Areas

Entrances to regulated areas shall be posted with legible signs bearing the legend

CANCER SUSPECT AGENT AREA
AUTHORIZED PERSONNEL ONLY

Further,

- (2) Areas containing hazardous operations, or where an emergency currently exists, shall be posted with legible signs bearing the legend

CANCER-SUSPECT AGENT IN THIS AREA
PROTECTIVE EQUIPMENT REQUIRED
AUTHORIZED PERSONNEL ONLY

Although the October 4, 1974 OSHA Regulation did not address itself to the details of this subject for vinyl chloride, it is recommended that the wording used in the regulations issued early in 1973 on the "14 carcinogens" be followed in the case of vinyl chloride regulated areas. This states that letters on such signs be at least 2" high.

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Labeling VCI and PVC Containers

The specified wordings in the VCM regulation of October 4, 1974 are:

- (3) Containers of polyvinyl chloride resin waste from reactors or other waste contaminated with vinyl chloride should be legibly labeled

CONTAMINATED WITH
VINYL CHLORIDE CANCER-SUSPECT AGENT

- (4) Containers of polyvinyl chloride shall be legibly labeled

POLYVINYL CHLORIDE (or trade name)
CONTAINS
VINYL CHLORIDE
VINYL CHLORIDE IS A CANCER-SUSPECT AGENT

Again, there are no details as to location and size, but the regulations on other carcinogens generally include the language

- (a) under or beside the primary label
- (b) lettering to be not less than 1/2 the size of the primary label, but not less than 8 point type nor more than 1 inch height.

The Transportation and Warehousing Department is in the process of redesigning our "universal" Geon vinyl bags, Gaylords and latex drums, and these will be placed on order in due course, so that you may begin using them for production starting January 1, 1975 for all Geon vinyl products. They will also provide labels which can be attached to shipping containers not so imprinted (off grade, scrap, etc.)

Our Corporate Legal Counsel has also suggested other additions to our labels, product literature and sales documents, to increase the level of customer notification and provide some guidance as to what should be done, e.g.

NOTICE
OPEN, HANDLE AND USE UNDER WELL VENTILATED
CONDITIONS. FOR DETAILS REFER TO OCCUPATIONAL
SAFETY AND HEALTH STANDARDS CHAPTER XVII Part 9010 1910
OF THE DEPT. OF LABOR, U.S. GOV'T DATED OCT. 4, 1974

A letter will be sent to you and our customer list summarizing these changes in package labeling and business materials.

Special consideration of the appropriate labeling of hopper cars and trucks is in progress. Special stickers or placards will be required. Tom Smith will see that you are provided with appropriate material before January 1, 1975.

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Finally, the labeling of vinyl chloride tank cars has been prescribed:

- (i) V I N Y L C H L O R I D E
EXTREMELY FLAMMABLE GAS UNDER PRESSURE
CANCER-SUSPECT AGENT

or,

- (ii) in accordance with CFR Part 173, Subpart II, with the
additional legends

CANCER-SUSPECT AGENT

applied near the label or placard

Our Transportation Department will have appropriate labels and recommendations in the hands of Calvert City before January 1, 1975 in accordance OSHA and ICC regulations.

/ksc
10/9/14

P. J. Weaver
B. M. G. Zwicker

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