

TO	F. H. Sollman	FIELD POINT OR DEPT. & BLDG. NO. Distribution	DATE YOUR LETTER
FROM	M. S. Fox	FIELD POINT OR DEPT. & BLDG. NO. Safety	DATE THIS LETTER 3/7/86
SUBJECT <u>LABELS & OTHER FORMS OF HAZARD WARNING</u>			

It is a requirement of the Hazard Communication Standard, 29CFR, Part 1910.1200, that each chemical manufacturer ensure that each container of hazardous chemical leaving the work place be labeled, tagged or marked with the following information:

1. Identity of the hazardous chemical(s),
2. Appropriate hazard warnings, and,
3. Name and address of manufacturer.

Your concern was whether or not the DOT labels meet the intent of this requirement. The answer is NO. DOT placards are intended to provide protection for those involved in transportation emergencies -- the OSHA hazard warning is intended to pass on specific physical and health hazard information to the recipient of the chemical.

As I interpret the standard we have two distinct areas which require your attention. In regard to our rail car shipments, the DOT labeling will surface during transit of the chemical. For OSHA compliance you must provide assurances, through documentation, that the recipient of our product has a Material Safety Data Sheet for the particular chemical.

I would suggest that you make a list of all rail and barge customers and then work through Cleveland Sales to determine if, in fact, an MSDS has been provided to the customer. If one has not, please mail to their attention immediately and document the occurrence.

In regard to the hazardous materials shipped out of the plant by bulk carrier, the following will apply when considering OSHA compliance:

- Each container of hazardous chemical, be it either a health or physical hazard, which leaves the plant must be labeled with the following information:
1. Identity of hazardous chemical(s),
 2. Appropriate hazard warning, and,
 3. Name and address of manufacturer or responsible party.

For compliance sake we will have included on the shipping order the identity of the hazardous chemical. The hazard warning requirement will be met by affixing the appropriate label to the container, i.e., flammable gas, corrosive, carcinogen, etc.

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It is also your responsibility to insure that each container of hazardous material being shipped to a customer for the first time has, included with the shipment, the appropriate Material Safety Data Sheet. I would suggest that the MSDS be forwarded along with the shipping order. You must also provide a means to document that the MSDS was provided.

Several of the requirements are new to your Group and I am sure we will need further discussion. When you are ready to talk, please call.



Michael S. Fox
Sr. Safety Engineer

/lw

cc: DRHise

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BFGoodrich**INTER-ORGANIZATION CORRESPONDENCE**

TO	Mike Fox/D. Boulware	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
FROM	Frank Sollman	FIELD POINT OR DEPT. & BLDG. NO.	DATE THIS LETTER 10-27-86
SUBJECT			

OSHA STANDARD FOR VINYL CHLORIDE

W. C. Holbrook forwarded to us documents developed by the Vinyl Institute concerning OSHA standards for Vinyl Chloride. After reviewing these documents, I have questions about the following:

Page 3 and Page 8

The Document states:

"OSHA rules require the 'Cancer Suspect Agent' statement to be added near the placard and that the labeling requirements in 1910.1017 take precedence over the Hazard Communication rule requirements in 1910.1200, but both rules should be followed."

Our Hazard Communication Label states "Cancer Suspect Agent." Would this label serve both purposes because of this statement? We do not have a "Cancer Suspect Agent" label near the placards.

Frank Sollman
Frank Sollman

FHS ln

cc: Don Hise
File

0238B

Frank
I checked with Waltemate & he
SAID the HAZ-Comm. label was
ok for the "Cancer Suspect Agent"
statement.

mf

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