

JJH: JCE: TGG: RF
XF: OSHA-HAZ COM

TO: Safety Directors

FROM: Tom Grumbles
DATE: November 29, 1984

Interoffice
Communication

SUBJ: HAZARD COMMUNICATION: MATERIAL SAFETY DATA SHEETS

VISTA

After speaking with all of the plants, the consensus (not majority) opinion is that it would be beneficial to standardize the in-plant MSDSs on the Vista form (enclosed). This will be an administrative burden initially but in the long term will help in the following ways.

1. In completing the standard MSDS form we can assure the content meets the minimum requirements of the standard.
2. We will assure that a complete hazard evaluation has been done on in-plant materials.
3. Facilitate the standard's requirement for explaining MSDSs and their contents.
4. Allow for the development of a "corporate" MSDS file which can be used for ongoing hazard determinations.

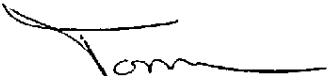
The back page, or Section 9 of the Vista MSDS is not required information under the standard, although the DOT classification may be significant for labeling purposes. How we will actually produce or print these sheets will be determined in the future. However, for now the following steps are proposed to facilitate MSDS production.

1. Complete the plant inventory and initial hazard determinations according to the procedures outlined in July. (attached)
2. By March 1 of next year send your hazardous materials inventory to me. I will review the inventories to determine common materials and those specific to particular plants. These inventories will also be used to determine common education needs.
3. The production of sheets for common or frequently used materials will be divided among the plants. Plant specific sheets will be produced by the plant using the material.
4. The MSDSs obtained in your Hazard Determination steps should be used to complete the in-plant Vista MSDS. Where no MSDS is available or more information needed, I can assist in getting that information.

VVV 000016120

Safety Directors
Page 2
November 29, 1984

As mentioned this effort will initially be time consuming but will prove beneficial in the future. Although the first compliance date is still 12 months away we need to be working towards compliance now to avoid the rush. Please call if you have questions on the above.



Thomas G. Grumbles

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Enclosure

cc Bill McClain

VVV 000016121

ATTACHMENT 1

HAZARD DETERMINATION PROCEDURE

1. Inventory all chemicals shipped into and out of your plant. This should include the following:
 - a. Vista commercial products
 - b. Process additives, catalyst, etc.
 - c. Maintenance materials and solvents
 - d. Laboratory chemicals received in bulk quantities (5 gallon containers and up).
2. Compare the plant inventory to the OSHA "floor" list of hazardous materials. These are materials found in the following references:
 - a. OSHA 2 Tables and 21 substance specific standards
 - b. 1983-84 ACGIH TLV List
 - c. NTP Annual Report (latest addition)
 - d. IARC Monographs
3. All of the materials on the plant inventory which appear on (a)-(d) above are considered hazardous. A MSDS must be obtained for them.
 - a. MSDSs already in-plant should be reviewed for content and accuracy.
 - b. When MSDSs are deficient, a new one should be requested from the supplier.
4. For materials on your plant inventory that are not on the sources listed in 2(a)-(d), a hazard determination must be done. To accomplish this two options are available.
 - a. Depend on manufacturers hazard determination. This is most simply done if a MSDS is available for review.
 - b. Review standard sources (listed in Appendix C of the Standard) or do literature searches.
5. MSDSs must be obtained or produced for all materials determined hazardous in Step 4.
6. Develop inventory listing of hazardous materials in-plant.

VVV 000016122

JUH: JCL: TGG: (RF)
XF: HAZ MAT Transp

TO: Tom Randolph

FROM: Tom Grumbles
DATE: November 28, 1984

Interoffice
Communication

SUBJ: DRUM LABELING REQUIREMENTS

VISTA

I have been asked to respond to your letter of November 16 to Paul Gowan regarding drum shipment marking and placarding requirements. Following are the answers to your questions regarding combustible ALFOLS.

1. What markings are required on the drums?

Packagings containing a combustible material are not required to be labeled. (49 CFR 172.400(b)(a))

2. Are placards required on the drums?

Placards are only required on hazardous materials offered for transportation in containers with a capacity exceeding 640 cubic feet. (49 CFR 172.512(a))

3. Are placards required on the trailers hauling drums?

A combustible placard is required only when a material classed as a combustible liquid is transported in a packaging having a capacity of more than 110 gallons, a cargo tank or tank car. (49 CFR 172.504, Table 2, Footnote 3). Trailers carrying 55 gallon drums should not be placarded.

4. If placards are NOT required on the drums, should the Bill of Lading HM description show the word "Placarded"?

The answer is no. It appears that from a DOT regulatory standpoint our current practices are correct.

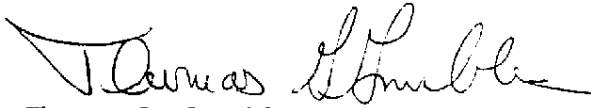
However, the bad news is the OSHA Hazard Communication Standard contains labeling requirements for containers of hazardous materials leaving the plant. Combustible liquids are hazardous under the OSHA Standard. The labeling portion of the standard is effective November 25, 1985. The labeling requirements are as follows: Identity, appropriate hazard warning or warnings, and name and address of the chemical manufacturer. Identity is defined as "any chemical or common name which is indicated on the MSDS for the chemical.

VVV 000016123

The standard further states that containers will be labeled in a manner which does not conflict with DOT regulations. It is clear that bulk shipments (railcars, tankers, etc.) will be labeled in accordance with only DOT requirements. However, for drums, shipped in a trailer it is not clear whether we must label the drums or

Tom Randolph
Page 2
November 28, 1984

supply the purchaser with the labeling information for use once the drums are in his plant. We are working on overall compliance with the OSHA standard and the decision on our labeling requirements will be made as part of that effort.

A handwritten signature in cursive script, appearing to read "Thomas G. Grumbles".

Thomas G. Grumbles

ajo
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cc P. Gowan, Bill McClain, Charlie Williams, Phil Ardoin

VVV 000016124