

TO: Steve Ashby

FROM: T. G. Grumbles

DATE: March 31, 1986

Interoffice
Communication

SUBJ: REVIEW OF VCM PLANT HAZARD COMMUNICATION PROGRAM

VISTA

I have reviewed the draft program. With the exceptions listed below, it appears complete and comprehensive.

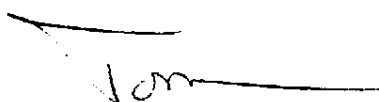
1. To be complete, Section I.B.5. should also include the labeling requirements for containers leaving the plant. For example, add the following: All containers of hazardous materials leaving the plant shall be labeled as above and have the company name and address included.
2. Paragraph (e)(ii) of the Hazard Communication Standard requires that the written program describe the methods used to inform employees of the hazards of non-routine tasks and hazards associated with unlabeled pipes, etc. The program as written does not specifically address this requirement. I believe this is done by the work permit system. A section describing this procedure should be added.
- 3.a. Under Section IV, Hazard Determination, you should add a section specific to the hazard determination for plant (VISTA) products. This could be another appendix or included in the body of the procedure.
- b. The need for Appendix I is not clear to me. In particular the third page, entitled VCM Plant Non-Hazardous Chemicals List seems redundant.

To avoid confusion I would recommend that you only include the third page of Appendix I, Appendix II, and Appendix V as your chemical lists. This would cause some changes in the text.

4. You should add a statement regarding the distribution of MSDSs for company products. I recommend you change the title of Section V-I to "MSDS for Product and Sample Shipments" and add the following statement there:

MSDSs for Vista products will be sent to customers as required by the standard from the corporate headquarters office.

Please call if you have questions on the above.


Thomas G. Grumbles

ajo/8

VVV 000017159