

Vista Chemical Company

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January 24, 1991

TOG: JCL: ERT: ~~MSH~~: ~~AJO~~: RF

XF: None

VISTA

Chemicals Manufacturers Association
2501 M Street, N.W.
Washington, DC 20037
Attention: Claudette Cofta

RE: DRAFT RFP LANGUAGE FOR MSDS GUIDELINE VIDEO

Dear Claudette:

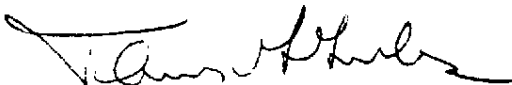
Below is draft language to address Items 1 and 2 of the RFP outline.

In 1984 OSHA promulgated the Hazard Communication Standard. This standard required that the hazards of chemicals produced and used in most workplaces be communicated to workers with a combination of training, container labeling, and Material Safety Data Sheets (MSDS). This was the first time that MSDS's were actually required by law for many chemicals and workplaces. The requirements for the content of the MSDS were "performance" in nature with listing of the type of information to be found on the MSDS, but no specific requirements for format and specific content.

Since 1984, other regulatory requirements have dictated the MSDS be used as a means of communicating chemical hazards to audiences outside of the workplace where training occurs. Specifically, SARA Title III has resulted in emergency services and the general public obtaining and trying to use and understand the content of MSDS's.

The difficulties experienced in industry with inconsistent MSDS's has been increased and magnified by the use of MSDS's by a growing number of audiences. These difficulties have been recognized by all concerned, including the regulators, and the need to improve the quality and usability of MSDS's to meet the needs of multiple audiences was clear. CMA decided in 1989 to lead this effort by forming a task group to define the problem and develop a guideline for the development of MSDS's. This effort is near completion and there is a need to develop awareness of the guideline and it's use.

Sincerely,



Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

VVV 000011695

Interoffice
Communication

TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: January 25, 1991
SUBJ: PROGRESS REPORT

VISTA

1. TGG conducted training on the revised New Product Development Process at R&D.
2. TGG attended a meeting at the Lake Charles Vinyl Chloride Plant to review status of the groundwater recovery project.
3. JCL participated in the Vinyl Institute Health, Safety and Environment meeting. A subcommittee was formed with JCL as chairman to ascertain the appropriate unit risk factor for vinyl chloride.
4. Comments were developed for the Vinyl Institute to submit to Louisiana DEQ regarding their proposed air toxics program.
5. JCL participated in a meeting at SDA with Green Cross to critique their program on the environmental certification of detergent formulations. Management was briefed.
6. EPA has finalized the boiler/furnace burning rule. It will likely cause the hot oil heater at LCLAB to become a hazardous waste facility.
7. JCL issued a memo regarding the applicability of the new stormwater permit regulation to railroad tracks.
8. JCL participated in the CMA Air Toxics Task Group meeting and generated comments on the MACT standard for the National Air Pollution Control Techniques Advisory Committee meeting the last week in January.
9. DOT Docket HM-181 "Performance - Oriented Packaging Standards", was published after lengthy delays on December 21. This regulation will significantly alter the present Hazardous Material Regulations. It becomes effective October 1, 1991 with a long transition period. The HM-181 Committee, which includes representatives from Environmental, R&D, Plants, and S&T, will begin devising an implementation strategy.
10. MJH consulted with Marketing and Market Development to develop an MSDS for Vista's new cadmium-free PVC compounds.


T. G. Grumbles

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