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January 27, 1986

VISTA

**Interoffice
Communication**

Mr. Robert Turkington
Industrial Hygienist
Right-To-Know Unit
Division of Occupational Safety and
Health Administration
1625 Shattuck Avenue, Room 302
Berkley, CA 94709

Dear Robert:

In regards to your letter of January 10 concerning MSDS's for Vista's Light Aromatic Concentrate and Heavy Ends EDC/VCM, I have several questions.

On both MSDS's you indicated we needed to add medical conditions aggravated by exposure and if the substance was a NTP/IARC/OSHA carcinogen. Both MSDS's have references to the carcinogenicity of the product. Is it necessary to specify which organization considers them to be carcinogens? I don't understand how this adds to the hazard information or evaluation of the material.

Regarding medical conditions aggravated by exposure, there is little or specific information to add here. Both benzene and EDC have systemic effects on multiple organs and organ systems as indicated in Section V of the MSDS. I would appreciate examples or guidance on how to convey this type of information in a succinct and meaningful manner that adds to the communication of these products hazard.

Thank you for your attention to this matter. We support the state's efforts in hazard communication and will do whatever is reasonable to produce MSDS's that accurately convey the hazards of Vista's products.

Sincerely,

Thomas G. Grumbles, CIH
Environmental Quality Manager

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cc J. R. Drumwright, M.D.
W. L. McClain
Steve Smith - CAL/OSHA

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