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Comments to DOL

February 10, 1989

Docket Officer
Docket H-022D
Occupational Safety and Health
Administration
200 Constitution Avenue, N.W.
Room N3670
Washington, D.C. 20210

Dear Sir/Madam:

On October 28, 1988, the National Institute for Occupational Safety and Health (NIOSH) submitted comments to the Occupational Safety and Health Administration (OSHA) on the Hazard Communication Standard (HCS). On December 6, 1988, NIOSH presented testimony at the OSHA hearing on HCS.

As requested by OSHA at this hearing, NIOSH submits the following material:

- 1. The World Health Organization's (WHO's) International Programme on Chemical Safety (IPCS) has prepared a report (Enclosure 1) on 75 International Chemical Safety Cards (ICSCs) that provides information on preventing accidents involving chemicals, health effects from exposure, protective equipment, first aid and emergency response, and disposal. The ICSCs follow the format discussed in the NIOSH criteria document (1974), An Identification System for Occupationally Hazardous Materials (provided previously in our submission to the docket) and are intended to provide safety information to people coming into contact with chemicals and/or having responsibility for programs on the safe use of chemicals and emergency response. Approximately 1200 cards will be completed at a rate of about 300 cards per year.
- 2. The NIOSH "Proposed National Strategies for the Prevention of Leading Work-Related Diseases and Injuries" (Enclosure 2) presents 10 strategies in two parts. In each strategy is an explicit discussion or implicit reference to the importance of hazard communication for the prevention of work-related injury and disease.
- 3. The Canadian Centre for Occupational Health and Safety has developed a data base on compact disc, read-only memory (CD-ROM) that is a compilation of up to 250,000 pages of occupational safety and health information. This information includes approximately 25,000 material safety data sheets (MSDSs) on chemical substances, as well as the NIOSH data bases NIOSHTIC and RIECS.

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Enclosure 3 includes a copy of the CD-RCM and instructions for its use, as well as an example MSDS on acetone that was printed from this disc.

4. Enclosure 4 is information on SilverPlatter. SilverPlatter is a private company in the United States and the United Kingdom which produces compact discs that contain many data bases including: 1) NIOSHTIC, 2) HSLINE from the Health and Safety Executive of the United Kingdom, and 3) CISDOC from the International Occupational Safety and Health Information Centre of the International Labour Organization.

If we may be of further assistance, please call me at FTS 684-8302.

Sincerely yours,

Richard W. Niemeier, Ph.D. Acting Director Division of Standards Development and Technology Transfer

4 Sets of Enclosures

œ:

- D. Bayse
- H. Hansen
- R. Lemen
- L. Reed
- D. Manning
- H. Ahlers
- D. Johnson
- V. Morgan

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Enclosures and/or attachments that are not included are available free of charge from the NIOSH Docket Office [513/533-8450].