

June 16, 1998

Dave Franks
Miller Paint Co.
12812 NE Whitaker Way
Portland, OR 97230

Dear Mr. Franks:

Thank you for your letter of June 5, 1997 inquiring whether Titanium Dioxide (TiO₂) must be included on the MSDSs for those paints in which it is an ingredient. Your question is based on the belief that TiO₂ is only considered a hazardous substance in Oregon. The determining factor whether a substance is considered a health hazard for the purpose of inclusion on an MSDS is the same in the Hazard Communications Standards for both Oregon OSHA and federal OSHA. A chemical is determined to be a health hazard if there is statistically significant evidence based on at least one scientific study that it may cause acute or chronic health effects in exposed employees. An immediate basis for establishing that a chemical is a health hazard is if it is one of the substances listed in 1910 Subpart Z or if ACGIH has set a threshold limit value (TLV). There is a TLV set by ACGIH for TiO₂ therefore it would be considered a health hazard for the purpose of hazard communication under both federal and state standards.

We have reviewed the MSDS you attached and we are concerned by some of the statements made within the MSDS. It states that no reportable quantities of hazardous ingredients are present, yet it lists health effects to include; drowsiness, bronchitis, nausea, vomiting, and diarrhea.

It is important that the downstream users of a product have this information available to them so that they can adequately protect their employees who may be using your product.

While the hazard may be present in the dust of sanded paint rather than the liquid paint being applied it is still important information to pass along to the users of the paint.

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Diane M. Cory
June 18, 1997

If you need additional assistance in researching the specific health hazards of these chemicals please contact one of our health technical specialists at (503) 947-7887.

You are also invited to see the OR-OSHA pages on the Internet at:
www.cbs.state.or.us/external/osha/index.html.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division

cc: Karen Barnack

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