

August 24, 1998

Joe Cissna, CIH  
Portland General Electric  
121 S.W. Salmon St.  
Portland, OR 97204

Dear Mr. Cissna:

This is in response to your letter of July 24, 1998, requesting our comments on the guidelines you developed regarding MSDS requirements for consumer products.

In reviewing these guidelines, we noted that it begins by explaining that chemicals exempt from the MSDS requirements of 1910.1200, "Hazard Communications" will be limited to specific cases. In the fourth example, you then provide an example where MSDSs are not required for the use of aerosol paint cans. We feel that this is too general and could be misleading, as there are instances when MSDSs would be required for aerosol paint cans.

The rest of your guidelines appear to meet the intent of 1910.1200.

If you have any questions or if we can be of further assistance, please contact David McLaughlin in our Technical Section at (503) 947-7457.

Sincerely,

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

S:\SHARE\TEC\_TEMP\LTRSINTE\DAVEM\RUSOIL.WPD