

Vista Chemical Company

15990 N. Barker's Landing Rd.  
Post Office Box 19029

Houston, Texas 77224  
Phone (713) 531-3200

TSCA-8(c)

June 8, 1988

VISTA

Mr. Ron McEwan  
Sun Chemical  
4526 Chickering Avenue  
Cincinnati, OH 42232

Dear Ron:

As we discussed, attached is a Vista TSCA 8(c) form we are requesting you complete for our evaluation. I have summarized below what I believe to be the facts of the allegation. Please correct or add to this summary when completing the form. Specifically, any information regarding the medical evaluation and treatment, and "severity" of the irritation would be appreciated. Please call me at 713/531-3445 if you have questions.

ALLEGATION SUMMARY

After performing a routine color pigment flush operation utilizing Vista 47 a female laboratory worker exhibited a significant irritation in various body locations that were uncovered during the work. The Vista 47 was being handled at a temperature of approximately 120°C. Chemical contact occurred as a result of exposure to a water/oil vapor or mist. The exposures occurred periodically over a 2-3 hour period.

The employee saw a physician who diagnosed the irritation as a "chemical irritation". The employee was removed from exposure and the rash subsided in 3 to 4 days. Medical treatment consisted of application of a standard skin cream or medication.

Sincerely,



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

ajo

Attachment

cc C. Pierson

VVV 000014707

June 7, 1988

- 120  
~~SDA~~ SDA

Alan B. Ward, Esquire  
Baker & Hostetler  
1050 Connecticut Avenue, NW  
Suite 1100  
Washington, DC 20036

**VISTA**

Dear Alan:

Following is Vista Chemical's response to SDA's Proposition 65 Survey. Vista Chemical is a manufacturer of raw materials for the soap and detergent industry. We do not manufacture in the State of California. The survey answers are based on these two facts. Vista is generally supportive of SDA activities addressing Proposition 65 issues but strongly urges an organized plan or strategy be developed and communicated. Specifically, close coordination of the various technical committees should be maintained.

**Part I**  
**Proposition 65 Compliance**  
**Exposure Warnings**

1.
  - a. None published
  - b. None
  - c. Multiple letters have been sent on request to customers.
  - d. We have included a copy of letters received from Shell Oil Company. These are the only such letters we have received.
2. Not applicable.
3. We have provided no warnings specifically for Proposition 65 on labels.
  - a. Not applicable - we produce no consumer products.
  - b. Not applicable.
4. No labels received to submit
5. We are planning to modify our MSDS's to provide specific Proposition 65 warning separate from standard hazard communication information, but have not done this as yet.
6. Specific exposure assessment information was developed for ethylene oxide in 1984 to respond to the new OSHA standard.

Some assessment has been done for VCM in customers workplaces.

Besides routine workplace monitoring, no other exposure or risk assessments have been done.

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7. The requests we have received routinely ask for information on any chemical on the Proposition 65 in the products purchased. Requests have been for quantitative information on Proposition 65 chemical levels in the products. Only one request, for VCM content, was chemical specific. Sample copies of our response letters are enclosed.

Although we have not kept exact data, we receive approximately 5-8 requests per week.

8. None  
9. Not applicable

#### Discharge and Other Questions

10. None
11. a. None  
b. 1-4 dioxane, multiple chlorinated hydrocarbons, polynuclear aromatic hydrocarbons (11 listed)
12. No
13. We don't manufacture consumer products - however, we do receive requests from feedstock or raw material customers on detergent intermediates such as ethoxylated alcohols and ether sulfates.
14. No
15. No
16. No, but we have committed financial support to a CSMA fund and effort which hasn't begun. Issues and parties concerned are undecided at this time.
17. Vista would consider financial support to fund industry efforts to litigate Proposition 65 issues. It is desirable the effort be coordinated with CSMA.
- a. Vista would consider joining as a financial supporter or party to a SDA or larger industry coalition.
- FDA and OSHA Hazard Communication preemption should be added to the list.
18. 1-4 dioxane  
Various chlorinated chemicals  
Polynuclear aromatic hydrocarbons (11 listed)

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19. This question is difficult to answer at this time based on our current experience, or non-experience with compliance or enforcement litigation.

## PART II

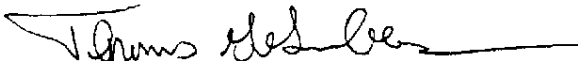
### REGULATION LEGISLATION

1.
  - a. Yes - believe to be too conservative
  - b. Not sure of implications
  - c. Yes - we need to clearly understand how they will operate
  - d. Yes - as a non-operator it isn't directly applicable but is an important scientific principle.
  - e. No comment
  - f. No comment
  - g. Yes - this is important as a supplier to the state
  - h. Yes - need to be reasonably conservative
  - i. If this means other states, then New York is important now based on a proposed Proposition 65.
2.
  - a. Yes
  - b. Yes - consistency across the board should be required
  - c. No comment
  - d. New York State; other states as proposed legislation occurs
3. See 2.d.
4. Yes

## PART III

1. A monitoring and dissemination of enforcement or compliance activity in California will greatly assist us in determining the validity or adequacy of our efforts.

Sincerely,



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

ajc

bcc W. J. B. Vogel  
W. L. McClain  
O. C. Kerfoot

VVV 000014710