

Vista Chemical Company

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VISTA

October 31, 1991

Mr. Mark Scoville
Assistant Director, Chemicals Division
1101 17th Street N.W. Suite 500
Washington, D. C. 20036

Dear Mark:

Attached is an agenda of the items we need to cover. Please review these items and let's discuss time needed to prepare and present them in a seminar/workshop format. Hopefully, we could cover them in a one day session.

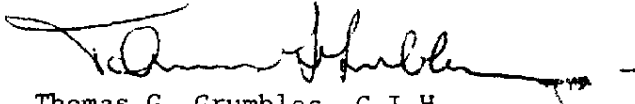
On Items 2(e), 3(b), and 5(b) I would provide specific details on the issue in question once a contract and/or confidentiality agreement are executed.

As discussed the meeting would be held at our R&D facilities in Austin, Texas. Specific travel details can be discussed later.

Our proposed dates for the meeting are November 22, December 3, 5 or 6.

Please give me a call at 713-588-3445 when you're ready to talk.

Sincerely,



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

dlj

Attachment

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PROPOSED AGENDA ITEMS

1. Inventory Descriptions: Methods and Rules
 - a. How chemicals are named
 - b. Differences in Class I, Class II descriptions, etc.
 - c. How process descriptions work - do process changes impact inventory names?
 - d. Inventory search techniques/tips
2. Akyl Range Issues
 - a. General description of problem
 - b. Agency practices - "unwritten rules"
 - c. SDA descriptions - are they functional?
 - d. How do we determine historical questions - What did dodecyl mean?
 - e. Specific Vista Issues - Alkylbenzenes, paraffins (specific details to be provided)
3. Inventory Corrections
 - a. 3rd party corrections - agency practices/rules
 - b. Vista corrections needed - how to proceed (details to be provided on Hammond products)
 - c. Downstream customer impact
4. PMN Process - How to be successful
 - a. Pre-submittal activities
 - b. PMN development - will QSAR arguments work?
 - c. Agency policy & practice on chemical classes and minimum data sets
 - d. Potential for 5(e) orders
5. Polymers Issues
 - a. General overview of polymers rules & practices
 - b. Specific Vista issue (details to be provided)

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