

Vista Chemical Company

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Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

JJH: ~~JCL~~ ICG: RF
XF: ~~Geo~~ MSB Reg

June 20, 1985

VISTA

Mr. Douglas L. Eisner
McKesson Chemical Group
One Post Street
San Francisco, CA 94104

Dear Douglas:

Enclosed is a request for material safety data sheets recently received from you. The products you listed are not manufactured by Vista Chemical Company. However, if these are your trade names for a product we supply to McKesson, please let me know and I'll send you the appropriate material safety data sheets.

Please call me if you have further questions on this matter.

Sincerely,


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

ajo/007

Enclosure

VVV 000016876

Thomas G. Grumbles

VISTA

To Jim Rutledge

Date 6/17

This is a rough draft of
possible inclusions. Is this
the type of stuff you're looking
for?

Let's discuss please -

TGS

VVV 000016877

ENVIRONMENTAL "YEARBOOK" INFORMATION

OKC, Aberdeen, and Baltimore modified operations and successfully reduced their regulatory burden by voluntarily rescinding hazardous waste permits.

Over 40 environmental permits were transferred from Conoco to Vista.

Negotiations with government agencies have resulted in settlement of three vinyl chloride lawsuits resulting in minimal expenditures by Vista.

An extensive groundwater monitoring program has been installed at the Lake Charles Chemical Complex at small expense to Vista to assess contamination from past activities at the site.

Three projects to clean up contamination in the Baltimore Plant were implemented at minimal cost to Vista.

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OF OSHA Labeling
and
DSK

TO: Distribution

FROM: Tom Grumbles

DATE: June 17, 1985

Interoffice
Communication

SUBJ: SUMMARY AND ACTION ITEMS: DRUM LABELING MEETING OF JUNE 11

VISTA

The following items were decided at the subject meeting.

1. Drum Label Format: The label will be a "stick-on" label of some sort, preferably vinyl or other durable material. The empty drum hazard warning label will be incorporated on the general hazard warning label to avoid having to affix two labels to the drums. Legal advises that the empty drum hazard warning language should be placed on all drums, not just those containing OSHA hazardous materials.

Action Items:

1. Bob Lamons will work with Darwin Phillips to "mock-up" several label formats and begin to get cost estimates for the printing.
2. Tom Grumbles will give Bob Lamons the empty drum hazard language to be incorporated on the general label.
3. John Levardson will get quantity estimates for all products drummed.
2. Label Content: The hazard warning language proposed in my May 31 memo plus the empty drum language will be the basic label content. Single product or some type of combination product labels, with the appropriate label being indicated in some form, were discussed. These options will be considered in the cost estimates.
3. Labeling Logistics: It appears that labeling logistics at the LCCP will not be too difficult. However, we need to determine how to assure our products drummed out-of-plant (Evans, etc.) are labeled.

Action Item:

1. Betsy Meyer and Dave Corrigan will review out-of-plant drumming procedures to determine the best means to achieve the needed controls.

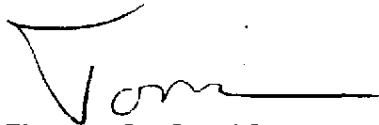
Many issues are left to be considered and resolved. The next meeting on drum labeling will be held July 9 at 9:00 a.m. in Conference room 2A. The following items should be considered for discussion at that meeting.

VVV 000016878

Distribution
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1. Labeling of other product containers such as samples, portable tank containers and railcars.
2. Potential impact of OSHA required labels on export customers.
3. Label supplies: inventory control, distribution, purchase point, etc.
4. Labeling of materials outside of normal product lines (off-spec, samples, wastes, etc.)

Please contact me if you have questions on the above or have discussion items to add.



Thomas G. Grumbles

ajo/007

cc J. A. DeBernardi, Dave Kuhn, Fred Thomas

Distribution:

R. R. Cooley
D. J. Corrigan
H. W. Hilgers
R. M. Lamons
W. L. McClain
B. R. Meyer
C. R. Miller
W. R. Parker
D. R. Phillips
C. F. Putnik
Tom Randolph

JH: JCL: TGG: (RF)
XF: None

TO: Dave Kuhn

FROM: Tom Grumbles
DATE: June 14, 1985

Interoffice
Communication

SUBJ: ENVIRONMENTAL RISKS OF FOB DESTINATION
vs. FOB PLANT

VISTA

Environmental exposure and risks for Vista if MeCl were sold FOB destination can be viewed from the statutory or regulatory risk involved and the less defined, but very real, product liability risk.

Methyl Chloride is a flammable, toxic gas. Besides the obvious fire and explosion hazards, MeCl is a narcotic gas. Human deaths have occurred after massive exposures to MeCl vapor as a result of simple asphyxiation and pulmonary edema. Severe but non-fatal exposures may result in delayed (24-48 hours) effects including vomiting, paralysis, coma, kidney and liver damage. These effects may result in death.

A transportation vessel failure resulting in a massive release of MeCl could cause groundwater contamination. However, the potential for this is much less than for a less volatile chlorinated material, such as EDC. In the event of a slow leak, most methyl chloride would evaporate and disperse before causing ground or water contamination. There is the potential for fire or explosion associated with a transportation incident resulting in property damage or human injury.

From a product liability standpoint, the FOB destination arrangement clearly increases our liability and, although not quantifiable, does lessen our defense in the event of an accident resulting in any of the above. This is a complex area that would involve, among other things contractual terms with any common carriers involved, and events surrounding the incident.

There are various regulatory reporting requirements established by the Department of Transportation and the Environmental Protection Agencies' Superfund Act. Both agencies require notification by the carrier or person in charge of the "vessel". These requirements are unaffected by product ownership. However, if we became aware that the carrier had not reported we would consider reporting under some circumstances.

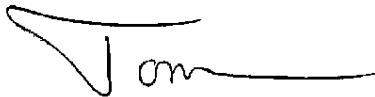
VVV 000016879

Under Superfund, there are financial liabilities for "Response, Removal, and Natural Resource Damage Costs" after a spill. If the product was owned by the customer

D. A. Kuhn
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at the time of a transportation incident, the liability for those costs, would be their's. At worst, the costs would be shared. If the product is clearly ours, then we would be wholly liable for those costs.

Under RCRA costs for clean-up of hazardous wastes, under any circumstance, "follow title" to the product. With the FOB destination arrangement we would be wholly liable for clean-up costs.

A handwritten signature in black ink, appearing to read "Tom" followed by a long horizontal stroke.

Thomas G. Grumbles

ajo/007