

Vista Chemical Company

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TGG: JCL: MMG: AJO: RF
XF: 283.1

March 2, 1989

VISTA

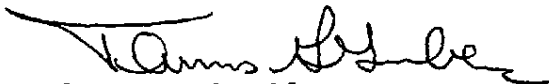
Stefan Teles
Berol-Nobel
430 N.W. 19th Street
Reserve, LA 70084

Dear Stefan:

As we discussed, I have enclosed examples of customer communication Vista has done regarding residual ethylene oxide in our alfonic alcohol products. These are examples provided to you for general information and should not be used by Berol-Nobel.

The short-term EO limit of 5.0 ppm for 15 minutes is now in effect.

Sincerely,



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

dlj

Enclosure

VVV 000006923

February 12, 1988

Mr. Hilgers
Manager of Marketing
Surfactants

Company
Address
City, ST Zip

Dear _____:

This letter is to inform you of a recently proposed OSHA rule-making that may impact the handling and labeling of ethoxylated alcohol products which may contain trace residual amounts of ethylene oxide. It will also re-emphasize our past communications regarding the presence of residual ethylene oxide in ethoxylated products.

On January 21, 1988 OSHA proposed to revise the existing occupational exposure standard for ethylene oxide by adding a 5.0 ppm, 15-minute time-weighted average Excursion Limit (EL). The proposal included revising the scope and application section by including the 5.0 ppm, 15-minute EL as an additional criteria for workplace exemptions in the standard.

The proposed regulation would read as follows. The underlined portion is the revision.

This section (the standard) does not apply to the processing, use, or handling of products containing EtO where objective data are reasonably relied upon that demonstrate that the product is not capable of releasing EtO in airborne concentrations at or above the action level (0.5 ppm), or in excess of the excursion limit (5.0 ppm) under the expected conditions of processing, use, or handling that will cause the greatest possible release.

In 1984 we provided data to our customers that supported our conclusion that the ethoxylated alcohols we produce met the original action level criteria for product exemptions. We are currently developing a plan to obtain the "objective data" necessary to determine if the same exemptions will apply in respect to the proposed EL of 5.0 ppm. If the regulation is finalized as proposed, these results will be available to assist you in your determinations of applicability. Currently it is anticipated the Regulation would become final in June or July, 1988.

VVV 000006924

We would like to re-emphasize that after the manufacture of ethoxylates there is a potential for trace amounts of ethylene oxide to remain in the liquid ethoxylate. Our manufacturing practices are designed to reduce this residual to the lowest levels practicable. However, you should be aware that under certain conditions, this residual ethylene oxide may accumulate in container vapor spaces or other confined areas. In the event entry or exposure to these areas occurs during your storage or use of these products, proper ventilation or other protective measures should be employed.

If you have further questions on this information, please contact your Vista Chemical Company Technical Sales Representative.

Sincerely,

Hilgers
H. W. Hilgers
Manager of Marketing
Surfactants

gk
2/12/88

VVV 000006925

October 10, 1984

Robert A. Klein
Manager of Marketing
Surfactants

Dear _____:

In the June 22, 1984 Federal Register, the Occupational Safety and Health Administration (OSHA) published a standard on occupational exposure to ethylene oxide. The standard applies to all occupational exposures to ethylene oxide except for the use of products containing ethylene oxide where objective data are available to demonstrate that handling these products will not release ethylene oxide to the atmosphere in amounts that would produce employee exposures exceeding the action level of 0.5 ppm as an eight-hour time-weighted average. We believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.107(a)(2).

Enclosed is Vista Chemical's statement regarding the applicability of the OSHA Ethylene Oxide Standard to Vista ALFONIC ethoxylates and what we believe to be objective data supporting our conclusion. If you have any questions on this information, please feel free to contact us.

Sincerely,

R. A. Klein
Manager of Marketing
Surfactants

RAK:dkh

Enclosure

VVV 000006926

VISTA CHEMICAL COMPANY STATEMENT
REGARDING APPLICABILITY OF OSHA ETHYLENE OXIDE STANDARD
TO WORKPLACES UTILIZING VISTA ALFONIC ALCOHOLS

We believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). Vista Chemical Company produces ethoxylates in our Lake Charles Chemical Plant. At that plant, after production, we have storage, railcar loading, and drumming personnel who handle the ethoxylates. During the operations described above, measurements have been made on personnel to evaluate ethylene oxide airborne concentrations in the areas of processing and handling. The results of these measurements indicate that overall personnel exposures in those areas are below the 0.5 ppm eight-hour time-weighted average Action Level specified in the OSHA Ethylene Oxide standard. Following is a summary of these measurements and how they were obtained.

DATA SUMMARY

In 1983 and 1984 nine personal samples were taken to evaluate ethylene oxide exposures to personnel directly involved in handling ethoxylated products. These operations predominately involved loading of railcars and drums. Samples were taken during those specific operations and range in length from one hour to four hours. Results of these samples indicate all exposures to be below 0.5 ppm. The highest sample was 0.4 ppm and all others were below our analytical detectable limits of 0.2 ppm.

ANALYTICAL TECHNIQUE

The samples discussed above were analyzed by a modified Quazi-Ketchan method. An SKS Quazi-Ketchan charcoal adsorbent tube was used to obtain the air sample. The sample was then desorbed with carbon-disulfide and analyzed via head space gas chromatography.

After manufacture of ethoxylates there is a potential for trace amounts of EtO to remain in the liquid ethoxylate. Our manufacturing practices are structured to reduce this residual to the lowest levels practicable. However, you should be aware that under certain conditions this residual EtO may accumulate in tank vapor spaces or other confined spaces. In the unexpected event of entry into these spaces, proper ventilation or other protective measures should be employed.

Based on the data above obtained during the operations we described, we believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). However, we do not know the specific ways you store and handle these products in your workplace. If they are significantly different than those we have described and evaluated, we recommend you make personnel measurements in your workplace as described in the standard.

VVV 000006927