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FROM: T. G. Grumbles

DATE: June 15, 1988

Interoffice  
Communication

SUBJ: PROPOSITION 65 DATA NEED

VISTA

In order to assure we are providing "clear and reasonable warnings" for Proposition 65 compliance we need to determine the potential for metals to leach from PVC compound or dryblend and result in environmental release or create the potential for worker exposure, such as with cooling water contact.

California Proposition 65 requires risk assessments to be done and/or warnings be given if "any detectable" quantities of the chemicals listed by Proposition 65 are present. The list is attached for your reference. Specifically we need to determine the leachability of the metals used in compound or dryblend. These include arsenic, cadmium and lead.

We should analyze cooling water from the belt trays and do EP or TCLP type leachate studies on the compound. I believe we need to do "worst case" or the compounds with the highest percentage of additives of concern first.

Please give me a call to discuss how to proceed. If we have historical data it can be used for this assessment. We may want to send all samples to be analyzed to the same place.

  
T. G. Grumbles

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cc Ed Sones  
Jim Yates

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