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F. L. C. D.

March 7, 1986

VISTA

Lt. Pat Touchard
Hazardous Substances Section
Louisiana State Police
P.O. Box 66614
Baton Rouge, LA 70896

Dear Pat:

Vista Chemical Company, Westlake, Louisiana would like to take this opportunity to comment on the current draft RTK regulations. Vista has three chemical plants in Westlake and these regulations are of great interest to Vista.

1. Purpose - The purpose of the regulation is stated as insuring hazards are communicated to "affected persons" within the state. Based on the actions required in the regulations, specifically, notification and reporting, it is not clear how affected persons, those living near chemical plants, will be informed. Will the survey form and/or MSDS's submitted to the state be generally available to the public or local communities?
2. Definitions
 - a. "Chemical" is defined, but "Hazardous chemical" is not. The words "hazardous chemical" are used in other portions of the regulation. If the chemicals listed in the four appendices are "hazardous" for the purposes of this regulation, that should be stated, or an alternate definition given.
 - b. "Explosive" - this definition should be more specific. As written, it includes many gases not classically considered explosive. The DOT explosive definition should be considered.
 - c. "MSDS's" - The regulation states they must be prepared in accordance with paragraph (g) of the regulation. This paragraph was unavailable. A general requirement that they meet the requirements of OSHA 1910.1200 is suggested.
3. Notification - In general, the notification section should be consistent with current DEQ reporting requirements. As written the notification section would result in numerous calls reporting events that have no potential to cause off-site effects. The reporting of such events would do little to achieve the goals of the regulation.

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