

TO: Mike Nathan

PVC w/ATT

FROM: T. G. Grumbles

DATE: March 23, 1988

Interoffice
Communication

SUBJ: REACTOR CULL SALES

VISTA

Attached is the previous correspondence regarding the sale of PVC reactor culls. The shipping regulation mentioned in the 5/13/87 letter has become effective. The only significant change since May of 1987 is the label content for PVC containers. Current labels for all PVC containers contain a VCM warning. We would want to reemphasize the potential for VCM exposure by way of transmittal letter for the MSDS or with an attachment to a sales contract.

Also, the attached MSDS has a 1000 ppm RVCM number listed. This may need to be revised. What do we know about the RVCM ranges?

There are product liability concerns with the end-use of this material. We should try to get information regarding what products this off-grade material is put into.

T. G. Grumbles

ajo
.301

Attachments

cc W. L. McClain
R. R. Smith
V. E. Messick
R. A. Frohreich
A. A. Salah

VVV 000022704

none

Thomas G. Grumbles

VISTA

To Environmental Coordinators

Date 3/22

We now have the following
draft ATSDR Toxicological
Profiles.

Lead

VCM

Benzene

Bis(2-ethylhexyl) phthalate

Nickel

Chloroform

Please let me know if you would
like copies of any of those you haven't
received copies of already.

TGS

VVV 000022705

42/ Desk

TO: Distribution

FROM: T. G. Grumbles
DATE: March 21, 1988

VISTA

Interoffice
Communication

SUBJ: ANALYTICAL WORK FOR REGULATORY REQUIREMENTS

Based on a review of the list Jim Yates prepared, it is clear that benzene and the PNA's are the chemicals with the potential to appear most often in our products. Therefore, initial efforts should be prioritized towards the analytical work for those two chemicals. From a Proposition 65 standpoint warnings are required now for benzene and will be required beginning in July for the PNA's. If analytical method development is required for the PNA analysis, this should be high priority.

Second in priority, based on regulatory deadlines and product volume in commerce, would be EtO and dioxane. We already know a lot about these levels and additional work may only include data gathering, reviewing sampling frequency, and determining if current sampling frequency allows us to generate representative data.

Third in priority would be the various chlorinated compounds on the Prop 65 list. These are BCME, CCL4, chloroform, epichlorohydrin, PCB's and vinyl chloride. These chemicals have the potential to be present in less volume for commercial purposes, but the warnings will be required in October of this year, except for BCME which is required now.

The remaining analytical needs are for DEHP, nickel catalyst fines, lead acetate and arsenic. Arsenic warnings are required now.

Attached is a suggested "project" organization based on the priorities described. Also, I've listed several general issues that should be considered. It should be noted that some PCB analysis and benzene in LAB work has been done in response to other regulations in the last two years. In several cases, collection of existing data will be our first step. Please review the enclosed then we'll schedule a conference call to discuss details of the project.


T. G. Grumbles

ajo
.310

Enclosure

DISTRIBUTION: Jim Yates
Ron Poe
Charlie Starks

VVV 000022706

GENERAL ISSUES

- How do we represent the data?
Ranges, $\pm$ accuracy statements, not to exceed ...
- How do we collect samples and/or how many analysis do we do to assure representative data?
- How do we validate non-referenced methods? (This may or may not be an issue.)
- Pro/cons of doing the work or all of the work at an "outside" contract laboratory.
- Analytical method applicability to different products (i.e., is benzene in LAB method same as benzene in HCL?)
- Significant data currently exists for dioxane, EtO, and VCM residual levles. Some data exists for benzene and PCB's.

PROPOSITION 65 CHEMICALS (EFFECTIVE DATE) AND
PRODUCTS TO BE ANALYZED - PRIORITY GROUPINGS

BENZENE
 (3/1/88)

PNA's
 (7/1/88)

LAB
 Hydrotropes
 Specialty Alkylates
 AlCl₃ Liquor
 Muriatic Acid
 Sulfonic Acids
 Na Salt Slurries
 N-Paraffins
 Solvents (LPA, MR)
 HAD
 LAC
 Plasticizers

LAB
 Hydrotropes
 Specialty Alkylates
 AlCl₃ Liquor

 Sulfonic Acids
 Na Salt Slurries
 N-Paraffins
 Solvents (LPA, MR)
 HAD
 LAC
 ALFOLS (mp greater than 70°F)
 Plasticizers

ETHYLENE OXIDE
 (7/1/88)

1,4 DIOXANE
 (1/1/89)

Ether Sulfates
 ALFONICS

Ether Sulfates
 ALFONICS

Epichlorohydrin
 (10/1/87)

BCME
 (3/1/88)

CCL₄
 (10/1/88)

Chloroform
 (10/1/88)

PCB's
 (1/1/89)

VCM
 (3/1/88)

EDC
 VCM

MECL
 VCM
 EDC

MECL
 VCM
 EDC

MECL
 VCM
 EDC

EDC
 VCM
 PVC
 LAB's

MECL
 EDC
 PVC

LEAD ACETATE
 (1/1/89)

ARSENIC
 (3/1/88)

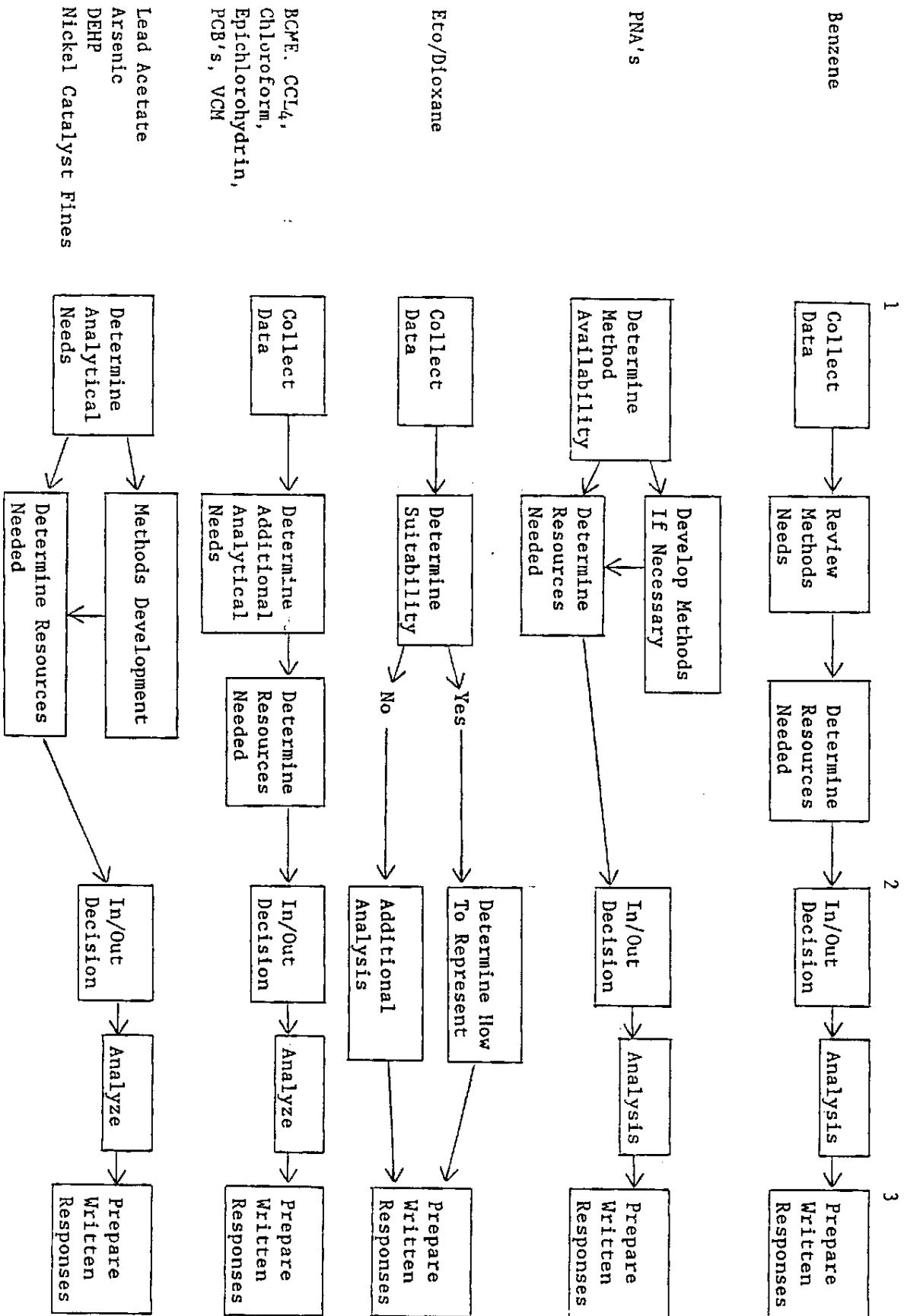
NICKEL CATALYST FINES
 (10/1/88)

Hydrotropes
 AlCl₃ Liquor
 HCL
 Sulfonic Acids
 Ether Sulfates
 Na Salt Slurries
 MECL
 Alumina
 PVC

Hydrotropes
 AlCl₃
 HCL
 Sulfonic Acids
 Ether Sulfates
 Na Salt Slurries
 Ether Sulfates

ALFOLS
 ALFONICS
 Solvents

VVV 000022708



- 1 Collect data: Correspond with plants
- 2 In/out decision: decision on whether to use outside contract laboratory
- 3 The end product would be a form or standard response letter

VWV 000022709