

To: H. G. Coleman

From: C. W. Turner
Date: February 6, 1987

Subject: RESIDUAL VCM ANALYSIS

Interoffice
Communication

VISTA

Per our conversation of February 4, 1987, this letter will serve to summarize the analysis and reporting requirements that the Vinyl Department will need to adequately monitor the residual VCM content of dried resin. Vista is receiving pressure from virtually all of our customers to reduce the residual VCM content of the dried resin (to levels of as low as 10 parts per billion). The customers are applying this pressure so they can ensure compliance with existing and proposed regulations by the government (EPA - TCLP and FDA) and the National Sanitary Foundation (NSF).

The Vinyl Department is now maintaining control charts for the residual VCM content of 5305 and 5265 as follows:

- a) Slurry for every batch as it is pumped over from the small blend tanks to 407 blend tank.
- b) Every dryer regular.

If the slurry results are abnormally high, the operators can check for plugged or isolated spargers thus preventing high results for later batches. If the dryer regular results are high, the operators can investigate the cause and also coordinate silo inventories with the Yard to aerate that resin longer. However, our success at monitoring and controlling these residuals is highly dependent on receiving analysis results from the Lab within 24 hours of being logged in. In the past, these analyses have been considered low priority and we've not received the results for 48 hours or more. Dave Cox has now instructed his technicians to provide us with this information on weekends also.

As we make equipment and technology improvements that enable us to consistently provide low residual VCM content in both 5305 and 5265, we'll start focusing our efforts on the other grades of resin. Please evaluate the Lab's ability to respond to our analysis and reporting requirements and communicate to your technicians that this will be a long term program. We appreciate the Lab's cooperation in meeting this new challenge.

C. W. Turner

C. W. Turner
Vinyl Operations Supervisor

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cc: JF, JWW, DWH, VEM, JME, EGJ, JRW, DSC