

TO: J. O. Gregg-Ponca City

TO: JCL: MMG: AJO: RF
XF: Desk

FROM: T. G. Grumbles
DATE: February 13, 1989

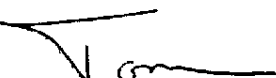
Interoffice
Communication

SUBJ: 1-4 DIOXANE ANALYTICAL METHOD

VISTA

As part of our Proposition 65 Analytical Project, we are developing consensus answers for the contaminants on the Proposition 65 list. 1-4 Dioxane is listed. The "answer" we develop will be based on an analysis of the historical data we have, and will include a copy of the analytical methods used.

Can you provide me with the method we know Stepan to be using. I believe we have a current one based on our last meeting with them in Chicago. For your information, I've attached minutes from the last meeting of our team regarding this effort. Sones or Yates can fill you in on any details.


T. G. Grumbles

dlj

Attachment

cc: O. C. Kerfoot-Ponca City

VVV 000006786

Interoffice
Communication

TO: Distribution

FROM: R. M. Porter

DATE: January 30, 1989

SUBJECT: Proposition 65 Analytical Report - January 24th Meeting

VISTA

On January 24th, a meeting was held in Lake Charles to update Proposition 65 analytical data from all Vista production plants and to "firm-up" the format that will be used in Vista Chemical's Proposition 65 report. The need for additional work was also to be established.

Present at the meeting were:

Tom Grumbles - Houston
Jim Yates - Ponca City
Gina Lakich - Hammond
Paul Fetzer - LCVCM

~~Mike~~
~~Martin~~ Fishbein - Baltimore
Ed Sones - Ponca City
Don Whitehead - LCLAB
Mike Porter - LCCP

Grumbles began the meeting with a review of the overall project, emphasizing recent developments. Next, each plant site representative discussed the status of sample testing outlined by action steps of a conference call held August 15th last year. Action steps from these discussions were:

T. Grumbles

- * - Distribute latest list of Prop 65 Chemicals to plant reps.;
- * - Collate data from PVC plants (Aberdeen, Blaine, Premiere);
- * - Pursue dioxin in ether sulfates data.

Baltimore

- * - Check on testing other specialty alkylates (not V3050 or V7050) for benzene.

LCCP

- * - Investigate variability of ethylene oxide levels in ethoxylates;
- * - Investigate possibility of analyzing benzene in butadiene in house;
- * - Work with Ponca City on benzene results for SSO and Molex raffinate.

LCLAB

- * - Have samples associated with Define Process analyzed for Nickel.

LCVCM

- * - Determine detection limit of epichlorohydrin test;
- * - Work with Ponca City on standard for BCME test.

Ponca City

- * - Analyze $AlCl_3$ and Alumina samples for nickel and lead;
- * - Procure plasticizer samples and analyze for metals;
- * - Work with Hammond on possible benzene formation during storage and transfer of sulfonic acid;
- * - Analyze EDC for arsenic.

The group then discussed the format in which the data should be presented in the final Prop 65 document. Recommended changes to the proposed format were:

Detection Limits: State specific value and not a range, where possible.

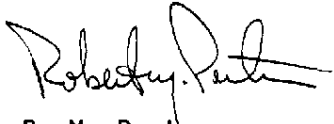
Results: For small sets of data, report only the range of results;
For large sets of data, report average and std. deviation.

OTHER ACTION STEPS

- All - When going through new product development process, determine whether Prop 65 testing will be necessary;
- LCCP - Determine source of benzene in C_{10-12} paraffins. Benzene content impacts phenol project being considered at Baltimore;
- ✓ TGG + LCCP - Determine most feasible means of classifying Prop 65 results on ethoxylate products;
- TGG - Need to consider the need for statistically better data from a commercial aspect - specifically relating to market surveys of competitor's product. Input from Vogel desired.

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- TGG - Chain of Custody Forms - Provides Chemist w/memos regarding use of these forms for Prop 65 samples.
- All - The group agreed to an April 1 deadline on the plant summaries to Tom.



R. M. Porter
Senior Project Chemist
Lake Charles Chemical Plant

lag

Distribution:

T. G. Grumbles - Houston
M. A. Fishbein - Baltimore
G. Lakich - Hammond
D. K. Whitehead - LCLAB
P. L. Fetzer - LCVCM
J. E. Yates - Ponca City
E. L. Sones - Ponca City

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