



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 4 1991

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

Mr. Thomas G. Grumbles
Manager, Environmental Affairs
Vista Chemical Company
900 Threadneedle
Houston, Texas 77079-2990

Dear Sir:

With regard to:

"For Your Information" submission on: Soil, groundwater and
surface water
contamination

Submitted by: Vista Chemical Company

Date submitted: May 14, 1991

EPA Document Control Number: FYI-OTS-0591-0808

EPA's Office of Toxic Substances (OTS) has completed a preliminary review of the above referenced submission provided to the Agency on a "For Your Information" (FYI) basis. Enclosed is a copy of a submission "Summary" for your records.

Please refer to the enclosure entitled "EPA Information Requests" for specific questions about the above referenced FYI submission. Should you have any questions about this letter, please me at (202) 475-8823.

The Agency looks forward to continued cooperation with your company in its ongoing efforts to evaluate and minimize the potential risks posed by chemical substances to health or the environment.

Sincerely,

Jaqueline T. Favilla
Jaqueline T. Favilla (TS-778)
Chemical Risk Identification
Section/CSB/ECAD/OTS/OPTS

Enclosures

VVV 000006540

EPA INFORMATION REQUESTS

- 1 -

With regard to FYI-OTS-0591-0808, EPA:

1. ☒ is not asking for any additional technical information at this time, but may do so in the future.
2. ☐ requests that you ensure that EPA receives a full copy of the final report (including the actual experimental protocol, results of gross/histopathologic examinations (where applicable), data, results of any statistical analyses, etc.) from each study, the summarized or preliminary results of which were presented in the submission.
3. ☐ requests that you describe the actions that your company has taken or plans to take on a voluntary basis to:
 - a. ☐ notify ☐ workers, ☐ others and/or ☐ _____ about the reported findings,
 - b. ☐ reduce and/or eliminate exposure to the subject chemical(s).
4. ☐ requests that you provide complete copies of Material Safety Data Sheets and labels that have been revised to reflect the reported findings.
5. ☐ requests that you describe (by way of short summaries) the nature and results, if available, of all studies (other than those submitted already to EPA or those cited in the published scientific literature) about which your company is aware or that your company has conducted, is conducting or plans to conduct that are designed to determine the toxicity of or the exposure to the subject chemical(s).
6. ☐ requests that you provide substantiation for any TSCA Confidential Business Information (TSCA CBI) claim(s) asserted for this FYI submission by responding in full to the questions posed in the attachment entitled "Support Information for Confidentiality Claims."
7. ☐ Other:

All information requested herein should be transmitted to the OTS Document Processing Center at the address provided on the next page within 20 working days of your receipt of this EPA mailing; with the exception of responses to TSCA CBI substantiation requests,

VVV 000006541

which are discussed further below, any requested information or supplemental information that is not yet available but becomes available following your response to this mailing should be sent to EPA immediately upon your company's receipt of such information.

OTS Document Processing Center (TS-790)
(Attn: FYI Coordinator)
Office of Toxic Substances
U.S. Environmental Protection Agency
401 "M" Street, S.W.
Washington, D.C. 20460

In responding to any EPA requests for information, or in otherwise communicating with the Agency about this FYI notice, please refer to the Document Control Number assigned to this file. As is the case for initial FYI notices, all responses/correspondence will be placed in the OTS public files unless confidentiality is claimed in accordance with the procedures outlined in 40 CFR Chapter 1, Section 2.203 et seq., and 41 FR 36902, September 1, 1976 as amended at 43 FR 40000, September 8, 1978; 50 FR 51661, December 18, 1985. In the event that a claim for confidentiality is made on all or part of the provided information, said information will only be released by EPA to the extent, and by means of the procedures, set forth in the cited regulations.

If you have been asked to provide full substantiation for TSCA CBI claims under EPA Information Request No. 6 on the preceding page, you are advised that pursuant to 40 CFR, Chapter 1, Section 2.204 et seq., EPA is determining whether the information in your FYI filing is entitled to confidential treatment. You must file within 20 working days a full written response to each question posed in the attached item entitled "Support Information for Confidentiality Claims." Requested information provided by you which is claimed confidential shall not be disclosed by EPA except in the manner provided by 40 CFR Chapter 1, Section 2.205(c).

If you need an extension of time in which to answer the questions posed in the attachment, please direct a written request to the above address prior to the date on which answers are due to EPA.

If you do not respond to these substantiation questions or do not request an extension within the time period provided, the Agency will construe your failure to respond or to request an extension as a waiver of your confidentiality claim(s).

Attachment

VVV 000006542

Support Information for Confidentiality Claims

Information submitted under specific reporting requirements of the Toxic Substances Control Act (TSCA) or in support of TSCA is subject to the provisions of Section 14 of TSCA and to EPA's Regulations on the Confidentiality of Business Information (see 40 CFR Part 2). You must comply with the following procedures to assert a claim of confidentiality for the information solicited in the attached letter. Failure to follow these procedures fully at the time you submit the information to EPA will be interpreted by the Agency as a waiver of your claim of confidentiality.

Asserting a Claim

Information claimed as confidential must be clearly marked by boxing, circling or underlining. All pages containing such information should also be stamped "CONFIDENTIAL". Care should be taken to ensure that these markings do not obscure the submission's text.

Sanitized Copy

Two copies must be submitted of any documents containing information claimed as confidential. One copy should be complete, with the information being claimed as confidential marked in the manner described in the preceding paragraph. The other copy should have all of the information claimed as confidential excised. This version will be placed in EPA's Public Files.

Substantiating Claims of Confidentiality

Detailed written responses to the following questions must be provided at the time you submit information for any portion of the information you claim as confidential. Your responses should be as specific as possible, with examples as appropriate, and should provide substantiation arguments for all types of information (e.g., sales or production/importation volumes, chemical identity, company identity) you claim as confidential.

1. For what period of time do you assert this claim of confidentiality? If a claim is to extend until a certain event or point in time, please indicate that event or time period. Explain why the information should remain confidential until such event or time.
2. Have there been any confidentiality determinations made by EPA, other Federal agencies, or courts in connection with this information? If so, please enclose copies.

(over)

VVV 000006543

3. Has any of the information that you are claiming as confidential been disclosed to individuals outside your company? Will it be disclosed to such persons in the future? If so, what restrictions, if any, apply to use or further disclosure of the information?
4. Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming as confidential. What other steps, if any, have you taken to prevent undesired disclosure of the information during its use or when an employee leaves your company?
5. Does the information claimed as confidential appear or is it referred to in any of items listed below:
 - advertising or promotional materials for the chemical or the end product containing it;
 - safety data sheets or other similar materials for the chemical or the end product containing it;
 - professional or trade publications; or
 - any other media available to the public or to your competitors.

If you answered yes to any of the above questions, you must indicate where the information appears and explain why it should nonetheless be treated as confidential.

6. Would disclosure of this information be likely to result in substantial harm to your competitive position? If so, you must specifically describe the alleged harmful effects and indicate why they should be considered to be substantial. Also, you must describe how disclosure of the information would cause the harm.
7. If the information in question is "health and safety data" pursuant to 40 CFR Part 2.306(3)(i), do you assert that disclosure of the information you are claiming as confidential would reveal:
 - a) confidential process information;
 - b) confidential proportions of a mixture; or
 - c) information unrelated to the effects of the substance on human health or the environment?

If your answer to any of the above questions is yes, you must explain how such information would be revealed.

VVV 000006544

FYI Submission Summary

SUBMISSION NUMBER: FYI-OTS-0591-0808 INIT SEQ:A
SUBMISSION DATED: May 14, 1991
SUBMITTER NAME: Vista Chemical Company

CHEMICAL NAME: PVC manufacturing facility contaminants in soil,
groundwater and surface water

STUDY DESIGN AND RESULTSEnvironmental Site Assessment for Vista Chemical Company Facility,
Aberdeen, Mississippi (Final Report)

- Waste characterization and site assessment were completed at the Vista Chemical Facility in Aberdeen, MS, a PVC manufacturing facility. The remedial investigation was being undertaken in response to Administrative Order No. 1831-90 issued by the Mississippi Department of Environmental Quality. This was in response to concerns about potential releases of contaminants to soils, groundwater and surface water at the plant.
- The waste samples collected and analyzed contained bis (2-ethylhexyl) phthalate (BEHP) and di-n-octyl phthalate (DNOP) predominantly. Vinyl chloride, chloroethane, acetone, and methyl chloride were also commonly detected in waste samples. The results of analyses indicate that concentrations of BEHP and DNOP decrease with depth.

OTHER:

The submitter reported that "The potential for such releases was first brought to the attention of [the Agency] in June 1981 when the owner of the facility at the time, the former Conoco Chemicals Company, provided notice of past waste disposal pursuant to CERCLA Section 103(c).

Subsequently, [the Agency] had followed up the 103(c) notice with various investigations at the Vista Aberdeen plant. The most recent of these took place in 1989 when NUS Corporation, working under EPA Contract ... conducted a Site Screening Inspection at the plant."

VOLUNTARY ACTIONS INDICATED:

— WORKER/OTHERS NOTIFICATION

— EXPOSURE REDUCTION

— MSDS/LABELS CHANGED (results in current MSDS)

X OTHER The submitter included remedial investigation conclusions and reported that the remedial investigation which Vista has undertaken is intended to clarify the conclusions drawn in the NUS report.

TGG: JCL: FGJ: AC: AJO: RF

XF: _____

Distribution: R. Seymour, B. Trego-Aber, H. D. Garrison, M. Lunsford-Okc, S.
Saborsky, G. Lipps-Premiere, G. Williams-Blane

cc: VPSAG LIST

Dave Penney, A. M. Nielsen, J. R. Roheim, Lee Matheson, Curt Elsik-Austin

J. R. Drumwright, T. H. Huffman

VVV 000006546