

Vista Chemical Company

15990 N. Barker's Landing Rd.
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

EO/Ethoxylates

March 21, 1986

VISTA

Dowell Schlumberger Incorporated
Attn: Eldon L. Burkett
Industrial Hygienist
Materials Control
P.O. Box 2710
Tulsa, OK 74101

Dear Mr. Burkett:

Vista Chemical Company's statement regarding applicability of the OSHA Ethylene Oxide Standard to Vista's Ethoxylates is attached. This statement was prepared in 1984 but is still applicable.

There is residual ethylene oxide in our ethoxylates, however, manufacturing conditions and procedures have been designed to minimize the level in finished products. Our experience has shown that when our ethoxylates are handled with reasonable care, the airborne concentration of EO is less than 0.5 ppm.

Please contact me at 713/531-3445 if you have further questions.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo/8

Attachment

VVV 000017209

VISTA CHEMICAL COMPANY STATEMENT
REGARDING APPLICABILITY OF OSHA ETHYLENE OXIDE STANDARD
TO WORKPLACES UTILIZING VISTA ALFONIC ALCOHOLS

We believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). Vista Chemical Company produces ethoxylates in our Lake Charles Chemical Plant. At that plant, after production, we have storage, railcar loading, and drumming personnel who handle the ethoxylates. During the operations described above, measurements have been made on personnel to evaluate ethylene oxide airborne concentrations in the areas of processing and handling. The results of these measurements indicate that overall personnel exposures in those areas are below the 0.5 ppm eight-hour time-weighted average Action Level specified in the OSHA Ethylene Oxide standard. Following is a summary of these measurements and how they were obtained.

DATA SUMMARY

In 1983 and 1984 nine personal samples were taken to evaluate ethylene oxide exposures to personnel directly involved in handling ethoxylated products. These operations predominately involved loading of railcars and drums. Samples were taken during those specific operations and range in length from one hour to four hours. Results of these samples indicate all exposures to be below 0.5 ppm. The highest sample was 0.4 ppm and all others were below our analytical detectable limits of 0.2 ppm.

ANALYTICAL TECHNIQUE

The samples discussed above were analyzed by a modified Quazi-Ketchan method. An SKS Quazi-Ketchan charcoal adsorbent tube was used to obtain the air sample. The sample was then desorbed with carbon-disulfide and analyzed via head space gas chromatography.

After manufacture of ethoxylates there is a potential for trace amounts of EtO to remain in the liquid ethoxylate. Our manufacturing practices are structured to reduce this residual to the lowest levels practicable. However, you should be aware that under certain conditions this residual EtO may accumulate in tank vapor spaces or other confined spaces. In the unexpected event of entry into these spaces, proper ventilation or other protective measures should be employed.

Based on the data above obtained during the operations we described, we believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). However, we do not know the specific ways you store and handle these products in your workplace. If they are significantly different than those we have described and evaluated, we recommend you make personnel measurements in your workplace as described in the standard.

VVV 000017210

TO: D. A. Kuhn

FROM: T. G. Grumbles

DATE: March 21, 1986

Interoffice
Communication

SUBJ: PROGRESS REPORT FOR THE WEEK ENDING MARCH 21, 1986

VISTA

1. Presented a training program with Bill McClain to Ponca City Research staff regarding technical assistance liability concerns and liability waiver form procedures and guidelines.
2. Reviewed the Return Bill of Lading form used by S&T for compliance with DOT regulations. Recommendations for changes were made.
3. Responded to a PVC Dry Blend customer regarding potential health effects in four workers at the customers workplace.
4. Pesticide registration for VMC 100 is proceeding. Data gaps have been identified and literature searches conducted. Some article translations are required. It is estimated that all data and articles available will be ready by May 1.
5. The revised VCM compliance plan for OKC was sent to EPA. Aberdeen's plan will be submitted once we receive confirmation of our agreement with EPA regarding ROL.
6. Retest of a 40-foot groundwater monitoring well in the east end of the Baltimore Plant showed 13 ppm benzene in the groundwater. Previous sample showed 5 ppm. We will work with DuPont to develop a position before going to the State.
7. Met with EPA - Dallas and received information on discharge parameters in the proposed LCVCM and LCCP wastewater permits. Allowable levels of benzene, toluene, and EDC will be set at 35 ppb. We will meet with the Plants, Engineering, and R&D to address this issue.
8. Provided guidance to LCVCM on handling heavy ends.
9. Contacted Vulcan regarding potential regulatory impacts on light ends sales.
10. Advised LCVCM that we must provide EPA with information on the incidental manufacture of PCBs. Contacts at BFG and PPG indicated they also produce PCBs in their VCM processes and so notified EPA.
11. Midwest Research Institute called to put us on notice that Vista will be receiving an extensive questionnaire from EPA on Ethoxylation Unit EO emissions.
12. Issued a memo on the regulatory implications of the Louisiana Hazardous Waste Regulations on several hydrocarbon streams produced at the LCCC.
13. Reviewed ALFOL® labels produced by McKesson and recommended that changes be made to the hazard warning statements.


Thomas G. Grumbles

VVV 000017211

~~NOTICE~~ ~~LETTERS~~
notice letters

March 21, 1986

VISTA

Mr. B. I. Raffle
Supervising Counsel
Environmental & Engineering Group
Conoco Legal Department
P.O. Box 2197
Houston, TX 77252

Certified - Return
Receipt Requested

Mr. H. J. Neeld
Director, Environmental Programs
Environmental Conservation
Conoco Inc.
P.O. Box 2197
Houston, TX 77252

Certified - Return
Receipt Requested

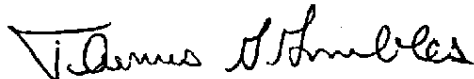
RE: U.S. v. Conoco Case # 83-2518

Gentlemen:

Pursuant to the Asset Purchase Agreement dated as of July 20, 1984, among E.I. Du Pont de Nemours and Company, Conoco Inc., and Vista Chemical Company, and the Consent Decree entered in the above action, we hereby provide notice of recently-discovered information which may lead to the filing of an Environmental Claim.

On February 28, 1986, the Vista LC VCM plant experienced a relief valve discharge from the VCM product Loading Bauxite Dryer. As a result of the incident report sent to the State, the enclosed request for further information has been received. Please contact George Hopkins at the VCM plant if you have any questions regarding this matter.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo/8

cc (w/att):

W. L. McClain
J. C. Ledvina
R. A. Conrad

VVV 000017212