

TGG: JCL: ~~EGJ~~: AC: AJO: RF

XF: None

TO: Rick Smith

FROM: T. G. Grumbles
DATE: October 22, 1991

Interoffice
Communication

SUBJ: RESIN ROAD SHOW TOPICS

VISTA

Attached is a table of our VCM emissions reported to EPA and our estimated 1991 reductions based on process changes and projects. This could be put in bar graph form or another visual way to demonstrate the significant reductions in VCM emissions. Some are a result of better estimating but much of the reductions are a result of actual emission reductions.

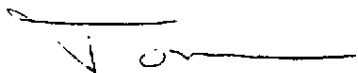
This can be used to demonstrate that we have aggressive environmental programs to reduce the impact of our operations on the environment and maintain our capability to operate.

Companion to the technical programs we are working with our surrounding communities to establish an understanding of our operations and develop a public acceptance of the plants. These efforts compliment the technical efforts to preserve our ability to operate.

The environmental performance of our plant at Aberdeen is evidenced by the VI environmental award. (Attached)

In recognition of the growing public concern over the use of heavy-metals and the contribution of them to solid waste, Vista is pursuing and has successfully reformulated some products to reduce or eliminate the use of certain heavy metals.

Hopefully this is what you're looking for.


T. G. Grumbles

cb

Attachment

VVV 000022679

WS

VISTA CHEMICAL COMPANY

VCM EMISSIONS

	TOTAL POUNDS			EST. LBS
	1987	1988	1990	1991
VCM	113242	15263	20394	15000
ABERDEEN	120000	76819	64295	24000
OKC	69244	66240	65712	24000
TOTAL	302486	158322	150401	63000
% REDUCTION (SINCE 87)		47.65973	50.27836	79.17259

VVV 000022680

Press Release

VISTA

91-31

FOR IMMEDIATE RELEASE

CONTACT: Bob Seymour
(601) 369-3606

Vista Chemical employees receive environmental award

ABERDEEN, Miss. (July 3, 1991) -- Employees at Vista Chemical's polyvinyl chloride (PVC) manufacturing facility in Aberdeen have received an award from the Vinyl Institute for their environmental performance.

"Our employees are caretakers of the environment," said Plant Manager Bob Seymour. They make conscious efforts each day to keep our plant safe and environmentally sound. Because of their commitment and active involvement, they are truly deserving of this award."

The Vinyl institute awarded the employees a first place in environmental achievement--the fourth consecutive first-place award for Vista in the five years the awards have been given.

"We received a perfect score from the Vinyl Institute for having no emissions or discharges of VCM (vinyl chloride monomer) during all of 1990 from places such as relief valves, rupture discs, and manual vents," explained Seymour.

(MORE)

VVV 000022681

Press Release

FOR IMMEDIATE RELEASE

CONTACT: Bob Seymour
(601) 369-3606

Vista Chemical working with Community Advisory Panel

ABERDEEN, Miss. (September 16, 1991) -- Vista Chemical Company's Aberdeen manufacturing facility employees are working with Aberdeen area neighbors through a recently formed Community Advisory Panel.

"We began by inviting a cross-section of our neighbors to participate in this panel earlier this summer," stated Vista Aberdeen Plant Manager Bob Seymour. "We formed this panel with one chief purpose in mind, to begin and maintain an ongoing dialogue with the community. We believe this panel will help us be more responsive to community concerns."

Panel members first met July 18 at the Aberdeen Best Western to familiarize themselves with Vista's Responsible Care® efforts as a member of the Chemical Manufacturers Association. Responsible Care® is a chemical industry initiative to improve performance in the areas of health, safety and the environment. In a subsequent meeting on August 22, panel members toured Vista's manufacturing facility and began defining preliminary goals for the group.

Preliminary panel goals include:

- improving communication by establishing an open dialogue between Vista and the community;

MORE

VVV 000022683

TO: R. D. Gamblin

TGG: JCL: FGJ: AZ: AJO: RF

XF: 1000

FROM: T. G. Grumbles
DATE: November 15, 1991

VISTA

Interoffice
Communication

SUBJ: 1991 DEPARTMENT ACCOMPLISHMENTS

Below is a summary of the activities and significant accomplishments during FY 1991.

REGULATORY

It was an active year for federal and state regulators in multiple areas. The department provided extensive technical support and advice to the plants, R&D, and S&T on the impact of the revised Clean Air Act, continued implementation of TC and Land Ban regulations, OSHA Process Safety Standards, and multiple DOT regulations including HM-181 and HM-126. Departmental personnel participated or led teams to analyze or develop implementation plans in the DOT and OSHA areas.

Departmental personnel also provided active technical assistance to Aberdeen in negotiating new state air and wastewater permits to Hammond in addressing wastewater permit concerns, to the LCCC in negotiating the NPDES and 304(1) wastewater permits, and to LCLAB in managing the impact of the Boiler and Industrial Furnace Rule.

TRAINING

During the year the department conducted four DOT training sessions and multiple environmental awareness training sessions at Aberdeen and the LCCP. A training program on FDA regulations and how they impact Vista's products was developed and provided to two marketing offices.

AUDITING

Departmental personnel conducted and participated in multiple audits. Two environmental audits and two DOT audits were conducted. Department personnel also participated in three ex-plant audits with S&T and audited nine waste treatment and disposal facilities used by company locations.

ASSESS PURCHASE AGREEMENT ISSUES

Multiple projects were initiated this year that were impacted by various APA retained liability provisions. A major cost sharing agreement was negotiated for the remedial investigation and remediation work that must be done at the LCCC for some 50 solid waste management units. This work will be active over the next 3-5 years.

VVV 000022685

A cost sharing agreement was negotiated with BP to cover remedial investigation and remediation work to be done at the Blane site.

A cost sharing and services reimbursement agreement was negotiated with Conoco to cover work at the Aberdeen plant that will determine the extent of groundwater contamination present, allow for excavation and recovery of 20MM pounds of resin currently buried at the old Pond 2 site, and removal of multiple drums of plasticizer waste buried prior to 1984. These agreements were reached in the absence of a governmental order compelling Conoco to participate with us in these activities.

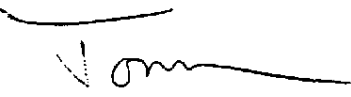
RESPONSIBLE CARE®

Responsible CARE® activities continued as the initial Distribution Code and Process Safety Code, and the second Pollution Prevention and CAER Code self-evaluations were completed.

New activities to support implementation included the development of a Responsible CARE® newsletter and organization of the Responsible CARE® Steering Team.

MISCELLANEOUS

Despite the absence of two professional staff members for four months, the department scored a 9.5 on our Q-Scorecard and moved our natural team rating from a 12 to a 14.


T. G. Grumbles

dlj

TO: TGG

FROM: Frank G. Jeanson
DATE: November 13, 1991

SUBJ: ENVIRONMENTAL HIGHLIGHTS - 1991

I. Environmental Audits

A. Plants

1. Austin - Complete audit of all media; air, water, waste, etc.
2. Blane - Complete audit of all media; air, water, waste, etc.

B. Ex-Plant

1. Rhone Poulenc, Sedalia, MO - Audit with S&T toll processor of ethoxylates.
2. Royal Plastics, Toronto, Ontario, Canada - Audit with Conoco potential customer of pond resin.
3. Sun Polymers, St. Gabriel, LA - Audit with Conoco potential processor of pond resin.

C. Disposal Facilities

1. Laidlaw, Crowley, LA - Audit potential handler of haz. waste for LCCP.
2. Calgon, Pittsburg, PA - Audit potential recycler of waste for LCVCN.
3. Calgon, Hunnington, WV - Audit potential recycler of waste for LCVCN.
4. Safety Kleen, Louisville, KY - Audit potential handler of haz. waste for LCVCN.
5. CWM, Niagra Falls, NY - Audit disposal facility for Blane haz. waste.
6. Laidlaw, North Andover, MA - Audit haz. waste storage and transport terminal used by Blane.

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7. Clean Harbors, Braintree, MA - Audit potential haz. waste storage and transport terminal for Blane.

8. Recovery Systems, Foxboro, MA - Audit recycler of waste oil used by Blane.

9. Hawk Plastics, Birmingham, AL - Audit potential recycler of by-product from Aberdeen.

II. Projects

(A) Aberdeen Pond 2 Resin Recovery Project - Worked with Aberdeen plant obtaining customer, getting approval from Conoco, getting contracts put together.

(B) Aberdeen Superfund Sites - Worked with plant, Conoco, and contractor (DERS) in completing Remedial Investigation, submitting report to the Miss. DEQ, working on follow up sampling program, and planning future work.

C. CMA 313 Reporting - Collected all plants 313 reports and sent in to CMA.

D. 313 Report Analysis - Put all of Vista's 313 report information together in a presentation format.

E. Industrial Toxics Project (33/50) - Attended EPA and CMA meeting, got input from plants on emissions reduction plans, and totaled emission reductions for total company.

(F) Aberdeen Buried Drum Removal Project - Put together bid packet, evaluated 6 bids, worked with Conoco choosing contractor, and worked with legal putting together contract.

G. CMA Work Group - Member of RCRA Waste Classification Work Group.

H. Aberdeen Environmental Training - Participated in Environment training of engineering and management personnel.

I. Ex-Plant Audit Questionnaire - Worked with S&T revising their Ex-Plant Environmental Audit questionnaire.

JCL 1991 Highlights

Assisted Hammond in negotiations with the City of Hammond and Rhone-Poulenc regarding the Hammond wastewater permit. Helped convince the City that the Hammond Plant does not need a wastewater permit to discharge to Rhone-Poulenc.

Worked with the Aberdeen plant in negotiations with MSDEQ regarding the appropriate VCM unit risk factor to be used to evaluate fence line risk. Got DEQ to accept a more favorable factor which will avoid the need for emission reductions.

Assisted Aberdeen in negotiations with MSDEQ on a new wastewater discharge permit. Final permit was considerably less burdensome than the proposed version.

Lead a team to develop and submit Vinyl Institute comments on the Louisiana VCM air toxics limit. The Louisiana program was delayed approximately a year and the final limit has not been promulgated.

Participated in negotiations with EPA on the LCCC NPDES permit renewal. The EPA is issuing a compliance order that will allow sufficient time to implement VISION while temporarily not lowering permit limitations.

Did environmental training at Aberdeen on 6/13 and LCCC on 4/4-5.

Obtained Kosher certification for PTAU alcohols and glycerine.

Participated in contractor evaluation and selection for the Blane Phase II and III waste site remediation. Phase II is currently underway. The firm of CH2M-Hill was selected as the contractor.

Participated in negotiations and evaluation of alternatives for the Aberdeen groundwater, drum removal and resin reclaim project.

Analyzed the regulations and advised LCVCM regarding classification of several wastes streams as F024. The plant has installed an interim system to insure that F024 wastes are not sent to the wastewater treatment ponds.

Worked with LCLAB to analyze the impact of the Boiler and Industrial Furnace rule on ASO burning. The plant

decided to ship ASO off-site for destruction rather than permit the Hot Oil Heater as a RCRA facility.

Analyzed numerous provisions of the amended Clean Air Act and communicated the implications to plants and management.

Participated in 6 meetings with magazine editors to promote the environmental safety of LAS.

Held FDA training with the Lisle and Saddlebrook sales offices.

Lead the effort to support alcohol sales to Aristech by developing a SARA 313 delisting petition for DNOP. Radian was hired as the contractor and a draft petition has been written.

11/12/91

VVV 000022691

TO: T. G. Grumbles

FROM: A. Clark

DATE: November 13, 1990

SUBJ: 1991 ACCOMPLISHMENTS

Per your request, here the major accomplishments in FY 1990 for the Product Safety Specialist position:

1. AC and AJD revised 5 material safety data sheets (MSDS) on the new form which includes expanded regulatory information. Twenty-four more are currently going through the approval process. Twenty new product MSDS's were generated. Forty-eight MSDS's had corrections made which caused reissue of those MSDS's. Sources for all MSDS data are being defined and documented for product liability concerns.
2. MJH participated in HM-126C Team with members of S&T to assure compliance with the Docket, Emergency Response Communication Standards.
3. AC reorganized HM-181 Team to continue developing compliance procedures for this Docket which will align the U.S. with international hazardous material transportation regulations.
4. AC led the DOT Team in conducting DOT Audits and Training at two plants, and two DOT Training sessions for S&T. Twenty plant personnel and 34 S&T personnel received training. Test scores from pre- to post-tests showed an average increase of 40% for all 4 classes.
5. AC responded to approximately 65 internal and external customer questions regarding MSDS's, TSCA, product constituents, regulatory status, etc.

Anne Clark AC

VVV 000022692

FGG: JCL: MMG: RF
XF: LCGW-Phase III
WIC

April 12, 1988

VISTA

Dr. Joe Bern
IT Technologies
William Penn Plaza
2790 Mossie Blvd.
Monroeville, PA 15146-2792

Dear Joe:

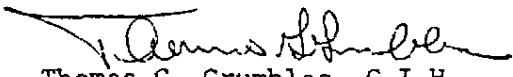
As discussed, the conference call has been rescheduled for Monday, April 18 at 11:00 a.m., Pittsburgh time. Below is the general agenda for the call. Bill Broddle of Conoco, and I will be involved from this end. I've enclosed a sample of the data format we plan to send you. Please review before the call.

AGENDA

1. Introductions
2. Review Background/Status of Project
3. Review/Discuss Mary Jones' Memo on Chemicals to be Included
4. Discuss possibilities to Reduce the Number of Constituents Included
5. Develop schedule for work
6. Review Action Items

Please call me at 713/531-3445 if you have any questions on the above.

Sincerely,


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

ajo

Enclosure

cc Bill Broddle
Jack Neeld
Mike Hayes
Tim Tate - IT

VVV 000022693

571

Toxicity Assessment Values for Pollutants In the Conoco/Vista
Lake Charles Groundwater Clean-up Project

VINYL CHLORIDE

TYPE OF INFORMATION	DATA	REFERENCES
Cancer Potency Factors	q_1^{*a} : Oral, 1.75×10^{-2} mg/kg/day ⁻¹ Inhalation, 2.95×10^{-1} mg/kg/day ⁻¹	EPA/CAG, 1985 ^b EPA/CAG, 1985 ^c /1987 ^d
Other Risk Values:	Oral (1 mcg/kg/day for 70 years): 230×10^{-5} Inhalation (1 ppm for 70 years): $11,000 \times 10^{-5}$	ATSDR, 1987 ^e ATSDR, 1987 ^e
No Adverse Effect Level (NOAEL)	Liver damage (Rats, oral): 0.13 mg/kg/day Reproduction (Rats, testis): 10 ppm	Til, et al., 1983 ^f Bi, et al., 1985 ^g
Water Standards	MCL: 0.002 mg/L (effective 1-9-89)	EPA/Safe Drinking Water Act
Absorption	Oral (animals): 80-100% Inhalation (humans): 42% Skin (animals): <0.1%	Feron, et al., 1981 ^h Krajewski, et al., 1980 ⁱ Hefner, et.al., 1975 ^j
Workplace Standard	1 ppm, 8 hr. time-weighted-average. 5 ppm, 15 minute time-weighted-average.	OSHA, 29 CFR 1910.1017 OSHA, 29 CFR 1910.1017
Food (plastic wrapping)	Maximum content set at 5-50 ppm so food concentration stays below 5 ppb.	ATSDR, 1987 ^e
Background Concentration in air, water, etc.	- Environmental levels <u>usually</u> below detection limit (0.005-4 ppb). - Not expected to adsorb to soil or sediments. Bioaccumulation is negligible.	ATSDR, 1987 ^e Hazardous Substance Data Bank, 1987 ^k

VW 000022694

REFERENCES FOR VINYL CHLORIDE/CONOCO-VISA
LAKE CHARLES GROUNDWATER CLEAN-UP PROJECT

- a) Upper-bound estimate of the low-dose slope of the dose-response curve using the multistage risk assessment model.
- b) Health & Environmental Effects Profile for Chlorethene. Cincinnati, OH; Environmental Criteria & Assessment Office; ECAO-CIN-P155, 1985.
- c) Drinking Water Criteria Document for Vinyl Chloride; Washington, D.C., Office of Drinking Water, EPA, NTIS PB86-118320, 1985.
- d) Vinyl Chloride Health Advisory Draft, Washington, D.C., Office of Drinking Water, EPA, 1987.
- e) Draft Toxicology Profile on: Vinyl Chloride; ATSDR; November, EPA, 1987.
- f) Life span oral carcinogenicity study of vinyl chloride in rats; Final Report, Civo Institutes, TNO, Report NO. V93.285/291099, 1983.
- g) Effect of vinyl chloride on testis in rats, Ecotox. Environmental Safety; 10(2), 281-289, 1985.
- h) Life span oral toxicity study of vinyl chloride in rats, Food Cosmet. Toxicol., 19(3), 317-333, 1981.
- i) Retention of vinyl chloride in the human lung, Br. J. Ind. Med., 37(4), 373-374, 1980.
- j) Percutaneous absorption of vinyl chloride, Toxicol. Appl. Pharmacol. 34, 529-532, 1975.
- k) Hazardous Substances Data Bank, National Library of Medicine Report, #169, 1987.