

Shelter Materials Group
Vinyl Building Products Group

CertainTeed Corporation
Governor Lane Blvd
PO Box 290
Williamsport MD 21795
301 223-7900
301 223-6249 (FAX)

CertainTeed 

FILE COPY

via Federal Express

September 1, 1992

Ms. Cindy Turkle, Manager
Marion County Landfill c/o Marion Co. Engineer's Office
1 Willett Drive * Rt. 5 Box 2
Knoxville, Iowa 50138

RE: *PVC Compound Waste, Wolverine Technologies - Grinnell, IA.*

Dear Ms. Turkle:

As we discussed during our telephone conversation this date, CertainTeed Corporation is the parent of Wolverine Technologies (hereinafter collectively referred to as CertainTeed), which of course includes our facility located in Grinnell, Iowa. Please know that I did enjoy our talk, and in order to properly document that conversation, and to allow us to provide additional pertinent information, the following is offered.

You advised during our conversation that several employees of the waste transfer station had concern and they had in fact relayed some symptoms which they attributed to dealing with our waste PVC compound material. It is further my understanding that these employees are dumping our waste materials on the floor of the transfer station and are thereby causing some airborne nuisance dust.

It is also my understanding that our Mr. Mark Romano (Site Environmental Manager for the Grinnell facility) has provided you with a Material Safety Data Sheet for PVC Compound, and I today provided you, via FAX, with a copy of CertainTeed's MSDS for vinyl materials which CertainTeed makes or generates as a result of our process. Therein you will find much of the information we discussed and which you will need to make an accurate assessment of this material.

I am also taking the liberty of enclosing with this letter a recent TCLP test analysis which will clearly document and substantiate our position that PVC Compound is NOT hazardous as defined by RCRA Subpart C, 40 CFR 261.

I ask that you please observe from those MSDSs' which have been provided to you that the only real condition which can be presented by the waste at issue, and in the manner in which you are dealing with this material, is that of a nuisance dust.

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CertainTeed

Ms. C. Turtle

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This dust is no more or less of a concern than are nuisance dusts of the same diameter and which can include soils, saw dust, etc. They possibly may, if your employees do not utilize customary safety precautions which I would suspect they would use in this type of operation; such as dust type respirators (simple filter masks) or adequate ventilation to keep concentration limits below that recommended by OSHA for nuisance dusts (eg: 10mg/m3) and safety glasses (with side shields) still only present (above those levels of concentration mentioned) the very minimal challenge of a temporary respiratory irritant with NO chronic health effects, and as a simple mechanical eye irritant; which again would be the exact same health concerns as breathing airborne dusts from soils. Should you be so inclined, I invite you to contact our Ms. Janis Reynolds, Director of Industrial Hygiene at our Corporate Health & Safety Department at 215-341-7000 should you have any specific questions relating to the the health issues of PVC as your employees relate to it.

I advised you that CertainTeed's desire is that we respond proactively in this issue so as to maintain our good and credible working relationship with your agency, so long as this did not necessitate an undue burden on our operation, or result in anything unreasonable. Any requirement which might be levied over than we discussed and to which we agreed would be arbitrary and capricious, and it would significantly hinder our ability to continue doing business. CertainTeed would in such an instance pursue appropriate legal recourses which are available to us. I trust however that we will be able to reach a mutually acceptable practice which will address your concerns.

To that end, I did commit to you that we would agree to a brief period where we would take powered PVC waste, place it in degradable containers, so as to prevent airborne releases, and take it separately to the landfill to thereby afford you an adequate period of time to evaluate this situation. I did however mention that we would not be receptive to both of these steps on more than a temporary basis as these activities are unnecessarily redundant, and the potentials simply do not warrant this undue burden beyond that of a brief time. I suggested that one or the other steps may be, in and of itself, reasonable to address all of the concerns of your employees.

You should know that CertainTeed Corporation operates several PVC manufacturing plants in many different jurisdictions.

CTL031639

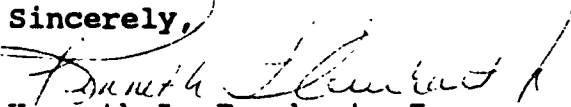
Ms. C. Turkle

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In each of these states we have and continue to landfill PVC waste in the manner which we have at your facility for many years. While I realize that you must examine this issue and all associated particulars, I hope that this knowledge will make you a bit more comfortable with our operation as it relates to your landfill site.

I remain available for any questions you might have and I look forward to hearing from you in this matter.

Sincerely,



Kenneth L. Everhart, Jr.
Manager, Safety & Environmental Affairs
Vinyl Building Products Group, &
Shelter Materials Group

cc: J. Oleson
M. Romano (w/ attachments)
M. Colitti
S. Carr, Esq.
J. Reynolds
S. Greulich - Iowa DNR, Waste Management Division
D. Elliott - Poweshiek County Landfill (w/ attachments)

attachments

CTL031640

ANALYSIS REPORT

CertainTeed Corporation
Ken Everhart
P.O. Box 288
Williamsport, MD 21795

AATS Sample #: WW 39650
Date Submitted: 12/23/91
Date Reported: 01/15/92
PO# Receipt#: HA-19054

Sample Identification: PVC Compound
Collected on at by

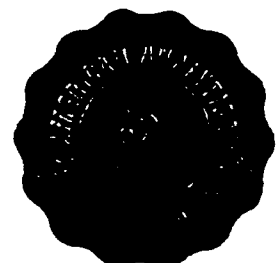
ANALYSIS	RESULT AS RECEIVED	LIMIT OF QUANTITATION
*Mercury	< 0.005 mg/l	0.005
The analysis for mercury was performed by KR on 01/03/92. The method used was EPA SW-846, Method 7470.		
*Arsenic	< 0.5 mg/l	0.5
*Selenium	< 0.5 mg/l	0.5
*Barium	< 2. mg/l	2.
*Cadmium	< 0.05 mg/l	0.05
*Chromium	< 0.5 mg/l	0.5
*Lead	< 0.5 mg/l	0.5
*Silver	< 0.1 mg/l	0.1

The extraction was performed by DR on 12/26/91.
The reported results for metals were corrected for the matrix spike recovery as specified in June 29, 1990 Federal Register, p. 26993.
The metal analyses were performed on a non-volatile leachate prepared according to the procedure specified in the June 29, 1990 Federal Register. A sample is considered to have failed the Toxicity Characteristic (TC) test and is considered a hazardous waste if any of the metal concentrations (mg/l) in the leachate exceed the following maxima (100 times the Primary Drinking Water Standards):

Arsenic	5.0	Cadmium	1.0	Lead	5.0	Selenium	1.0
Barium	100.0	Chromium	5.0	Mercury	0.2	Silver	5.0

The limits are published in March 29, 1990 Federal Register, pp. 11845-6.
The analyses for arsenic, selenium, barium, cadmium, chromium, lead and silver were performed by DRS on 01/04/92. The method used was EPA SW-346, Method 5010.

*subcontracted



ANALYSIS REPORT

CertainTeed Corporation
Ken Evernart
P.O. Box 288
Williamsport, MD 21795

AATS Sample #: WW 39650
Date Submitted: 12/23/91
Date Reported: 01/15/92
PO# Receipt#: HA-19054

Sample Identification: PVC Compound
Collected on at by

ANALYSIS	RESULT AS RECEIVED	LIMIT OF QUANTITATION
*TCLP Acid Base/Neutrals		
pyridine	< 0.040 mg/l	0.040
1,4-dichlorobenzene	< 0.026 mg/l	0.026
2-Methylphenol	< 0.027 mg/l	0.027
3 and 4-Methylphenol	< 0.030 mg/l	0.030
hexachloroethane	< 0.028 mg/l	0.028
nitrobenzene	< 0.024 mg/l	0.024
hexachlorobutadiene	< 0.028 mg/l	0.028
2,4,6-trichlorophenol	< 0.026 mg/l	0.026
2,4,5-trichlorophenol	< 0.024 mg/l	0.024
2,4-dinitrotoluene	< 0.021 mg/l	0.021
hexachlorobenzene	< 0.021 mg/l	0.021
pentachlorophenol	< 0.10 mg/l	0.10
The semivolatile analyses were performed on a non-volatile toxicity characteristic leachate of the submitted waste. The leachate was prepared according to the procedure specified in the March 29 and the June 29, 1990 Federal Registers.		
A sample is considered to have failed the Toxicity Characteristic (TC) test and is therefore considered a hazardous waste if any of the semi-volatile concentrations (mg/l) in the leachate exceed the following maxima:		
Total Cresol	200.0	Nitrobenzene 2.0
1,4-Dichlorobenzene	7.5	Pentachlorophenol 100.0
2,4-Dinitrotoluene	0.13	Pyridine 5.0
Hexachlorobenzene	0.13	2,4,5-Trichlorophenol 400.0
Hexachlorobutadiene	0.5	2,4,6-Trichlorophenol 2.0
hexachloroethane	2.0	

The limits are published in March 29, 1990 Federal Register, pp. 11845-6.
The analysis for TCLP semivolatiles was performed by TSW on 01/06/92.
The method used was SW-846, method 8270
*subcontracted



CTL031642

ANALYSIS REPORT

CertainTeed Corporation
Ken Everhart
P.O. Box 288
Williamsport, MD 21795

AATS Sample #: WW 39650
Date Submitted: 12/23/91
Date Reported: 01/15/92
PO# Receipt#: HA-19054

Sample Identification: PVC Compound
Collected on at by

ANALYSIS	RESULT AS RECEIVED	LIMIT OF QUANTITATION
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*TCLP Zero Headspace Extraction

The extraction was performed by BH on 12/26/91.
The reported results for regulated volatiles were corrected for the matrix spike recovery as specified in June 29, 1990 Federal Register, p. 26993.

Vinyl Chloride	(0.061 mg/l	0.061
1,1-Dichloroethene	(0.028 mg/l	0.028
Chloroform	(0.025 mg/l	0.025
1,2-Dichloroethane	(0.025 mg/l	0.025
2-Butanone	(0.50 mg/l	0.50
Carbon Tetrachloride	(0.025 mg/l	0.025
Trichloroethene	(0.026 mg/l	0.026
Benzene	(0.025 mg/l	0.025
Tetrachloroethene	(0.026 mg/l	0.026
Chlorobenzene	(0.025 mg/l	0.025

The volatile organic analyses were performed on a zero headspace toxicity characteristic leachate of the submitted waste. The leachate was prepared according to the procedure specified in the March and the June 29, 1990 Federal Registers.

A sample is considered to have failed the Toxicity Characteristic (TC) test and is therefore considered a hazardous waste if any of the volatile concentrations (mg/l) in the leachate exceed the following maxima:

Benzene	0.5	1,1-Dichloroethene	0.7
Carbon Tetrachloride	0.5	Methyl Ethyl Ketone (2-Butanone)	200.0
Chlorobenzene	100.0	Tetrachloroethene	0.7
Chloroform	0.0	Trichloroethene	0.5
1,2-Dichloroethane	0.5	Vinyl Chloride	0.2

The analysis for TCLP was performed by AJS on 01/04/92.
The method used was SW846 method 8240.

*subcontracted

Respectfully Submitted
American Analytical
Testing Services, Inc.
Reviewed and Approved by:
Howard E. Holzman
President



Material Safety Data Sheet

CertainTeed

CertainTeed Corporation
P.O. Box 860
Valley Forge, PA USA
19482-0101
(215) 341-7000
EMERGENCY TELEPHONE:
CHEMTREC (800) 424-9300

DATE PREPARED: MARCH 23, 1992

PRODUCT IDENTIFICATION

All types & grades of extruded & injection molded Vinyl Siding and Vinyl Siding Accessories;
Vinyl Window Lineals and Vinyl Window Accessories; and
Regrind

Chemical Name:	None	Degree of Hazard
CAS No.:	None	0 - Minimal (Insignificant)
Common Name:	None	1 - Slight
		2 - Moderate
		3 - Serious (High)
NFPA Rating:	<u>Health</u> 0 <u>Fire</u> 1 <u>Reactivity</u> 0	4 - Severe (Extreme)
HMIS Rating:	0 0 0	* - Chronic Health Effect(s)

(See Section 8 for acronyms/definitions.)

Description: For Regrind, CertainTeed Vinyl Siding and Vinyl Window Lineals have been ground into chips.

1. INGREDIENT INFORMATION

All ingredients are chemically or physically bound during the manufacturing process. Sawing siding and lineals or handling regrind may produce nuisance dust.

Chemical Name: None
CAS No: None
Common Name: Nuisance Dust

Exposure Limits:	<u>OSHA PEL</u>	<u>ACGIH TLV</u>	<u>OTHER</u>
	Total Dust: 15 mg/m ³	Total Dust: 10 mg/m ³	None
	Respirable Dust: 5 mg/m ³		

Percent in Product: N/A
LD₅₀: Not Available
LC₅₀: Not Available

This chemical is listed on: EPA SARA Title III, Section 313 ☐, 302 ☐, California Proposition 65 ☐,
Not Listed ☒

2. PHYSICAL DATA

Boiling Point (°F): None	Vapor Density (Air=1): N/A
Melting Point (°F): Unknown	Specific Gravity: Unknown
Odor: None	% Volatile by Volume: N/A
% Solubility (H ₂ O): Insoluble	Vapor Pressure: N/A
Appearance: Various colored chips, vinyl siding or vinyl window lineals.	

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3. FIRE AND EXPLOSION HAZARD DATA

Flash Point (°F) and Method: Not applicable to solid products.

Flammable Limits: LEL: N/A UEL: N/A

Autoignition Temperature: N/A

Extinguishing Media: Water spray, carbon dioxide, dry chemical.

Special Fire Fighting Procedures: Fire fighters should wear NIOSH/MSHA approved self-contained breathing apparatus.

Unusual Fire and Explosion Hazard: Toxic or irritating vapors, including hydrogen chloride, carbon dioxide and carbon monoxide, may be generated when the product is subject to heating or combustion.

4. PHYSICAL HAZARDS

Stability: Chemically Stable

Corrosivity: Not Corrosive

Reactivity: Stable. Hazardous polymerization will not occur.

Incompatible Substances: None

Reactivity with Water: None

5. HEALTH HAZARD DATA

Primary Routes of Entry: Inhalation, skin and eye contact.

Acute Effects:

Inhalation: Inhalation of dust may cause temporary respiratory discomfort.

Skin: None

Eyes: Mishandling these products may result in traumatic eye injuries.

Ingestion: No known effects.

Medical Conditions Which May Be Aggravated: Bronchial asthma or other chronic obstructive respiratory diseases may be aggravated by exposure to products of thermal decomposition.

Chronic:

Skin: None

Inhalation: None

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6. EMERGENCY AND FIRST AID PROCEDURES

Eye Contact: Flush eye(s) immediately with water, including under eyelids for at least 15 minutes. Contact a physician for further evaluation.

Skin Contact: No known effect.

Ingestion: Unlikely. Consult a physician if ingestion occurs.

Explosion: Does not support combustion.

Fires: Remove to fresh air, administer oxygen, get medical help.

7. SPECIAL PROTECTION INFORMATION

Personal Protective Equipment:

Respiratory System: Provide ventilation to control nuisance dust levels to worker exposure limits.

Eyes: Safety goggles or safety glasses with side shields.

Skin: Protective gloves when handling hot material.

Other Protection: Eye wash and safety shower.

Storage: To maintain product quality, store in a cool, dry, well-ventilated area.

Waste Disposal Information: Scrap material should be swept or scooped into a sealed, labeled container for recovery or disposal. Dispose in accordance with applicable federal, state and local government regulations.

Extruded CertainTeed Vinyl Materials are not presently listed as a hazardous substance by RCRA, Subpart C, 40 CFR 261.

8. ADDITIONAL COMMENTS

Acronyms/definitions used in this MSDS:

ACGIH: American Conference of Governmental Industrial Hygienists

CAS No: Chemical Abstracts Service Number

EPA: Environmental Protection Agency

HMIS: Hazardous Material Identification System

LC₅₀: The air concentration of a substance, when administered over a specified time period in an animal assay, is expected to cause the death of 50% of a defined animal population.

LD₅₀: The single dose of a substance that, when administered by a defined route in an animal assay, is expected to cause the death of 50% of a defined animal population.

LEL: Lower Explosive Limit

mg/m³: Milligrams per cubic meter

N/A: Not Applicable

NFPA: National Fire Protection Association

OSHA: Occupational Safety and Health Administration

PEL: Permissible Exposure Limit

RCRA: Resource Conservation and Recovery Act

SARA: Superfund Amendments and Reauthorization Act

Title III: Emergency Planning and Community Right to Know Act
Section 302 - Extremely Hazardous Substances
Section 313 - Toxic Chemicals

TLV: Threshold Limit Value

UEL: Upper Explosive Limit

CTL031646

MSDS

515 825 7347

Steve Greulich
waste Mgr Div
Grand Ave
Des Moines

Mr. Mark Purkle
515 825 5545
wks ago
caused irritation
-transfer station

SWA 2
permitted
disposal
transfer
disposing waste

no more
transfer
station

Frankville IA

50138

water

Box 2 - Willetts

De

County Engineers Office

Des Moines

7701

21N1

CertainTeed Corporation
Governor Lane Blvd
PO Box 290
Williamsport, MD 21795
301 223-7900



October 1, 1992

Ms. Marcellina Gurley
Air Toxics and New Source Permits Division
Air Management Administration
Maryland Department of the Environment
2500 Broening Highway
Baltimore, Maryland 21224

RE: Paint Spray Booth Permit Application

Dear Ms. Gurley:

Some weeks ago, I received a call from another individual from your department who requested additional information in support of our application for a permit to operate our paint spray booth. I apologize, but I have not been able to recall this individual's name to respond directly to him. I trust that you will please be so kind as to provide this correspondence to the official who is presently handling this permit review.

As mentioned, we were contacted by your office, and we were advised that our application was not complete as we had not provided all of the MSDSs which corresponded to the raw materials used in the paint booth. Because of this, we have contacted each supplying vendor and we have in fact received a few new MSDSs in response. We are however still awaiting several more sheets, which will provide to you all together.

I wanted to pass this information along to impress upon you that we are not in any whatsoever delaying our response to this most important issue; our response to the information requested is dependent however on the responsiveness of our vendors, which has been slower than we would have liked.

We will immediately forward those materials which you require to complete your review as soon as we receive them. In the interim, should you have any questions, please do not hesitate to contact the writer.

Sincerely,

CTL031648

Kenneth L. Everhart, Jr.
Manager, Safety & Environmental Affairs

FACSIMILE TRANSMITTAL

TRANSMITTED FROM:

Kenneth L. Everhart, Jr.
CERTAINTEED CORPORATION
P. O. Box 290 * Gov. Lane Blvd.
Williamsport, Md 21795
Telephone: (301) 223-7900 Ext. 12
Telex: (301) 223-7950
FAX: (301) 223-6249

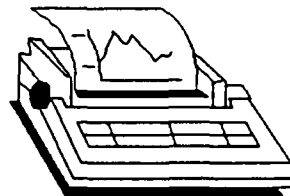
TRANSMIT TO: Mr. CINDY TURKLE, 11/12/92

COMPANY NAME: MARVIN Co Landfill

MAIL STOP: _____

TELEPHONE: _____

FAX NUMBER: 515 825 7349



CertainTeed 

Kenneth L. Everhart, Jr.
Manager Safety & Environmental Affairs

CertainTeed Corporation
Env Building Products Group &
Shelter Materials Group
PO Box 290
Gov. Lane Blvd
Williamsport MD 21795
301 223-7900

Voice Mail 800 359-7298
Box 2722
Fax 301 223-6249

*Attached per our conversation,
I will follow up with letter
later today. JLE*

CertainTeed 

CTL031649