

TO: J. A. DeBernardi

TGG: JEL: MMG: RF

XF: None

FROM: T. G. Grumbles
DATE: December 3, 1986

Interoffice
Communication

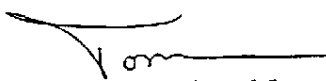
SUBJ: VCM INTERROGATORY

VISTA

Enclosed are three copies of the interrogatory we discussed. Please review the questions listed below and determine who is best to help answer the questions. The response is due December 23 and McClain advises there is slim chance of another extension. I'll call Monday to determine our next step.

QUESTIONS FOR PLANT REVIEW:

10	17	25
14	20	38
15	22	39
16	23	40


Thomas G. Grumbles

ajo/9

Enclosure

cc WLM (w/o enc.)

VVV 000000857

TO: D. A. Kuhn

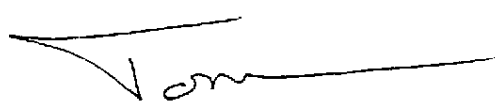
FROM: T. G. Grumbles
DATE: December 19, 1986

Interoffice
Communication

SUBJ: PROGRESS REPORT FOR THE WEEK ENDING DECEMBER 19, 1986

VISTA

1. Attended the Vinyl Institute Safety, Health, and Environment Committee meeting.
2. Advised Aberdeen regarding production of FDA-allowed 5415 (X-42).
3. EPA proposed a rule that could ban the land disposal of waste PVC. JCL is working with the Vinyl Institute to develop comments for the public hearing in January.
4. Occidental's VCM NESHAP's lawsuit has been amended to include every excursion from the standard occurring over the last 5 years. At the maximum penalty of \$25,000 per excursion, the potential penalty is \$15,000,000.
5. Provided information to VCFE on TSCA regulations concerning the import of ALFOL® 14 and 16 NF to the United States.
6. Updated federal environmental regulations for the plants.
7. The TSCA Inventory Update was completed and will be submitted to the EPA on Monday, December 22.
8. A MSDS and label were prepared for the new Novel ethoxylation catalyst.
9. DOT incorporated the Superfund list of chemicals into the Hazardous Materials Table. Approximately 300 previously unregulated materials will be regulated under DOT after January 1, 1987, and must be packaged, marked, labeled and shipped accordingly. Changes have been made to the COEDS hazardous materials description file.


Thomas G. Grumbles

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VVV 000000858