

~~TGG: JCL: BSI: MMH: AJO: RF~~

XF: None

TO: Distribution

FROM: T. G. Grumbles

DATE: April 5, 1990

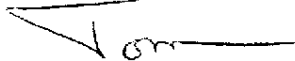
Interoffice
Communication

SUBJ: CUSTOMER NOTIFICATION ON SARA 313 STATUS OF
ETHOXYLATES/ETHER SULFATES

VISTA

Attached is a draft letter and attachment to be used for the subject notification. Please review and give me any comments you have by April 18.

As I understand, it was decided to "personalize" the letter by address and specific product(s) bought in 1989 and attach the commercial ethoxylates chart for the customer to use. We should target to have the mailing out by mid-May.



T. G. Grumbles

dlj

Attachment

Distribution: B. E. A. Larsen, R. E. Swantkowski, R. Johnson, M.
R. Sweet

O. C. Kerfoot-Austin

VVV 000012840

Dear (Customer)

This letter is to update you on the status of certain alcohol ethoxylates and ether sulfates under USEPA Section 313, Title III, SARA regulations. In December of 1989, Vista notified you that EPA considered 1, 2, and 3 mole ethoxylates to be covered by the glycol ether definition which appears on the Title III, Section 313 Toxic Chemical List. Further, Vista and Soap and Detergent Association (SDA) member companies were working with EPA to seek a clarification and resolution of this issue.

On March 2, EPA notified counsel for SDA that a formal rulemaking procedure would be required to obtain any modification of the glycol ether definition. It is clear that this issue will not be resolved by the July 1, SARA 313 emissions reporting deadline and EPA will require applicable 1, 2, and 3 mole ethoxylate and ether sulfate emissions for 1989 to be reported.

Our records indicate you purchased _____ in 1989. A table indicating the mole distribution by weight percent in Vista commercial ethoxylates and ether sulfates is attached for your use in calculating emission amounts for any required 313 reporting.

Please call me at 713-588-3445 if you have questions regarding this
issue.

VVV 000012842

PRODUCT NAME	MOLES EO	WEIGHT PERCENT
ALFONIC 610-50R ETHOXYLATE	1	9.690
	2	12.416
	3	13.413
ALFONIC 610-60 ETHOXYLATE	1	4.442
	2	6.666
	3	9.343
ALFONIC 810-23 ETHOXYLATE	1	22.584
	2	15.260
	3	9.634
ALFONIC 810-40 ETHOXYLATE	1	13.829
	2	13.936
	3	12.853
ALFONIC 810-60 ETHOXYLATE	1	5.058
	2	6.671
	3	8.389
ALFONIC 1012-40 ETHOXYLATE	1	12.531
	2	11.275
	3	12.553
ALFONIC 1012-60 ETHOXYLATE	1	4.580
	2	6.239
	3	7.825
ALFONIC 1214 GC-30 ETHOXYLATE	1	15.738
	2	12.747
	3	12.044
ALFONIC 1214 GC-40 ETHOXYLATE	1	11.457
	2	11.070
	3	11.759
ALFONIC 1216-22 ETHOXYLATE	1	19.333
	2	12.592
	3	10.010
ALFONIC 1412-40 ETHOXYLATE	1	11.476
	2	11.441
	3	11.845
ALFONIC 1412-60 ETHOXYLATE	1	2.686
	2	3.501
	3	4.730
ALFONIC 1412-60 ETHOXYLATE	1	2.686
	2	3.501
	3	4.730
ALFONIC 1412-A ALCOHOL ETHER SULFATE	1	11.476
	2	11.441
	3	11.845
ALFONIC 1412-S ALCOHOL ETHER SULFATE	1	11.476
	2	11.441
	3	11.845