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October 6, 1986

VISTA

Ms. Nicky Smith
Legal Department
Conoco Inc.
600 N. Dairy Ashford
McLean Building
Houston, TX 77252

Dear Nicky:

As we discussed, below are proposed answers to the interrogatory questions for which no previous answer has been given. These answers are based on my knowledge and experience since 1980.

Interrogatory No. 15 - This answer should be reviewed by someone in manufacturing.

The Company's products are produced to meet certain internal product specifications, or specifications agreed to by the customer and the company. Manufacturing and process controls are utilized to meet these specifications. Specification parameters are routinely measured for the finished product to assure desired specifications are met.

Interrogatory No. 16

The defendant has no specific records involving personal injury from the alleged toxic nature of said chemical products. Information used to produce product literature and labels was obtained from the open scientific literature and toxicity testing.

Interrogatory No. 17

The Company has maintained a file of alleged health effects for its products since November 21, 1983, in accordance with the Toxic Substance Control Act, Section 8(c) regulations. No allegation regarding the toxic nature of PVC or Cresylic Acid has been received.

Interrogatory No. 20

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No record of any conversation or statements are known to exist regarding the facts of the plaintiffs chemical exposures.

As we discussed, other questions and document production requests covered in your letter of September 30 will be referred to marketing or are adequately covered by previous responses. Also, our Newark files were sent to Conoco/DuPont at their request, soon after Vista closing.

Ms. Nicky Smith
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October 6, 1986

Notice to Produce - No. 16

Below is a list of applicable governmental documents in our files.

March 5, 1980 - Human Exposure to Atmospheric Concentrations of
Selected Chemicals; Systems Applications, Inc. EPA Contractor
Report

ACGIH TLV Booklet - purchased annually

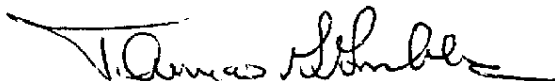
ACGIH Documentation of TLV's

NIOSH Criteria for a Recommended Standard - Occupational
Exposure to Cresol

CFR Wednesday, October 12, 1977, Part IV - Council on
Environmental Quality TSCA Interagency Testing Committee;
Initial Report to the Administrator

Regarding the Material Safety Data Sheets you attached to your
letter, these MSDS's were revised versions we began using during
late 1980. They are four page documents but you only sent me two
pages for each. If you do not have a four page document for each,
please contact me. I have enclosed the MSDS's that were in use
prior to the revised four page documents. To my knowledge these
were used from 1973 to 1980.

Sincerely,


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

ajo/9

cc P. Carey

VVV 000015525

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-11187

MATERIAL SAFETY DATA SHEET

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SECTION I

MANUFACTURER'S NAME Pitt-Consol Chemical Company		EMERGENCY TELEPHONE NO. 201/344-3800
ADDRESS (Number, Street, City, State, and ZIP Code) 191 Doremus Avenue, Newark, NJ 07105		
CHEMICAL NAME AND SYNONYMS phenol and methylated phenols	TRADE NAME AND SYNONYMS Cresylic Acid	
CHEMICAL FAMILY phenol, cresols, xlenols and trimethyl phenols	FORMULA C₆H₅OH + (CH₃)_nC₆H₅ OH: n = 1 to 3	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	375-413°F	SPECIFIC GRAVITY (H ₂ O=1)	1.03
VAPOR PRESSURE (mm Hg.)		PERCENT VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)	>3.0	EVAPORATION RATE (_____ =1)	
SOLUBILITY IN WATER	trace	freezing point	-40°F
APPEARANCE AND ODOR Clear liquid with sweet tarry odor			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	210°F PM	FLAMMABLE LIMITS	LeI	Uel
EXTINGUISHING MEDIA Water, fog, or spray - foam (NFPA Code 2)				
SPECIAL FIRE FIGHTING PROCEDURES Treat with same precautions as high boiling hydrocarbons (see MCA SD-48)				
UNUSUAL FIRE AND EXPLOSION HAZARDS				
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SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	5 ppm	Corrosive to any tissue, will cause severe burns and is
EFFECTS OF OVEREXPOSURE	absorbed, causing toxic symptoms. Repeated contact with low concentrations may cause dermatitis and chronic poisoning.	
EMERGENCY AND FIRST AID PROCEDURES	Call physician immediately. Wash skin contact with large amount of soapy water, wash with alcohol-water mixture if available. Wash eyes with water. For ingestion give large amount of salt water, sodium bicarbonate solution or milk, follow with raw egg whites or corn starch paste. Induce vomiting.	

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	
INCOMPATIBILITY (Materials to avoid)			
HAZARDOUS DECOMPOSITION PRODUCTS Not dangerously reactive			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Pick up mechanically
WASTE DISPOSAL METHOD
Biological oxidation or incinerate according to established federal procedures

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)		
When using hot material, use masks approved by U.S. Bureau of Mines		
VENTILATION	LOCAL EXHAUST	SPECIAL
	MECHANICAL (General) down draft	OTHER
PROTECTIVE GLOVES	rubber	EYE PROTECTION chemical safety goggles
OTHER PROTECTIVE EQUIPMENT Full length protective clothing		

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
OTHER PRECAUTIONS

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The above data are based on tests and experience which Continental believes reliable and are supplied for informational purposes only.

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

SECTION I

MANUFACTURER'S NAME Conoco Chemicals		EMERGENCY TELEPHONE NO. 601/369-8111
ADDRESS (Number, Street, City, State, and ZIP Code) P. O. Box 91, Aberdeen, Mississippi 39730		
CHEMICAL NAME AND SYNONYMS Polyvinylchloride, PVC		TRADE NAME AND SYNONYMS CONOCO PVC Compound
CHEMICAL FAMILY Vinyl Polymers	FORMULA (-CH₂CH-)_x Cl	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
Vinyl Chloride Monomer: less than 1.0 ppm		

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	solid	SPECIFIC GRAVITY (H ₂ O=1)	
VAPOR PRESSURE (mm Hg.)	solid	PERCENT VOLATILE BY VOLUME (%)	<0.5%
VAPOR DENSITY (AIR=1)	solid	EVAPORATION RATE (_____ = 1)	solid
SOLUBILITY IN WATER	nil		
APPEARANCE AND ODOR			

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SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used) Not applicable	FLAMMABLE LIMITS	Lel	Uel
EXTINGUISHING MEDIA Water, CO₂, dry chemical			
SPECIAL FIRE FIGHTING PROCEDURES When fighting fires in confined spaces, self-contained breathing apparatus should be used.			
UNUSUAL FIRE AND EXPLOSION HAZARDS Evolves hydrogen chloride and other toxic gases when burned. Exposure to combustion products should be avoided.			

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

None established. ACGIH TLV of 10 mg/m² total dust recommended

EFFECTS OF OVEREXPOSURE

Exposure to PVC as such poses no overt hazard. In confined usage or storage areas, use adequate ventilation.

EMERGENCY AND FIRST AID PROCEDURES

Flush eyes with large amounts of water.

SECTION VI - REACTIVITY DATA

STABILITY

UNSTABLE

CONDITIONS TO AVOID

STABLE

X

INCOMPATIBILITY (Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION

MAY OCCUR

CONDITIONS TO AVOID

WILL NOT OCCUR

X

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Sweep up.

WASTE DISPOSAL METHOD

Prefer landfill rather than incineration.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

NIOSH approved dust respirator for dusty operations.

VENTILATION

LOCAL EXHAUST

SPECIAL

MECHANICAL (General)

OTHER

If applicable for dust control.

PROTECTIVE GLOVES

None

EYE PROTECTION

Safety glasses

OTHER PROTECTIVE EQUIPMENT

Ground lines on transfer equipment

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

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OTHER PRECAUTIONS

Observe OSHA regulation in Title 29, CFR, Part 1910.1017.