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Desk

VISTA

SUBJ: ANALYTICAL WORK FOR REGULATORY REQUIREMENTS

DISTRIBUTION: Jim Yates
Ron Poe
Charlie Starks

GENERAL ISSUES

- How do we represent the data?

Ranges, $\pm$ accuracy statements, not to exceed ...

- How do we collect samples and/or how many analysis do we do to assure representative data?
- How do we validate non-referenced methods? (This may or may not be an issue.)
- Pro/cons of doing the work or all of the work at an "outside" contract laboratory.
- Analytical method applicability to different products (i.e., is benzene in LAB method same as benzene in HCL?)
- Significant data currently exists for dioxane, EtO, and VCM residual levles. Some data exists for benzene and PCB's.

VVV 000009916

PROPOSITION 65 CHEMICALS (EFFECTIVE DATE) AND
PRODUCTS TO BE ANALYZED - PRIORITY GROUPINGS

BENZENE
(3/1/88)

LAB
Hydrotropes
Specialty Alkylates
AlCl₃ Liquor
Muriatic Acid
Sulfonic Acids
Na Salt Slurries
N-Paraffins
Solvents (LPA, MR)
HAD
LAC
Plasticizers

PNA's
(7/1/88)

LAB
Hydrotropes
Specialty Alkylates
AlCl₃ Liquor

Sulfonic Acids
Na Salt Slurries
N-Paraffins
Solvents (LPA, MR)
HAD
LAC
ALFOLS (mp greater than 70°F)
Plasticizers

ETHYLENE OXIDE
(7/1/88)

Ether Sulfates
ALFONICS

1,4 DIOXANE
(1/1/89)

Ether Sulfates
ALFONICS

Epichlorohydrin
(10/1/87)

EDC
VCM

BCME
(3/1/88)

MECL
VCM
EDC

CCl₄
(10/1/88)

MECL
VCM
EDC

Chloroform
(10/1/88)

MECL
VCM
EDC

PCB's
(1/1/89) (3/1/88)

EDC
VCM
PVC
LAB's

VCM
(3/1/88)

MECL
EDC
PVC

LEAD ACETATE
(1/1/89)

Hydrotropes
AlCl₃ Liquor
HCL
Sulfonic Acids
Ether Sulfates
Na Salt Slurries
MECL
Alumina
PVC

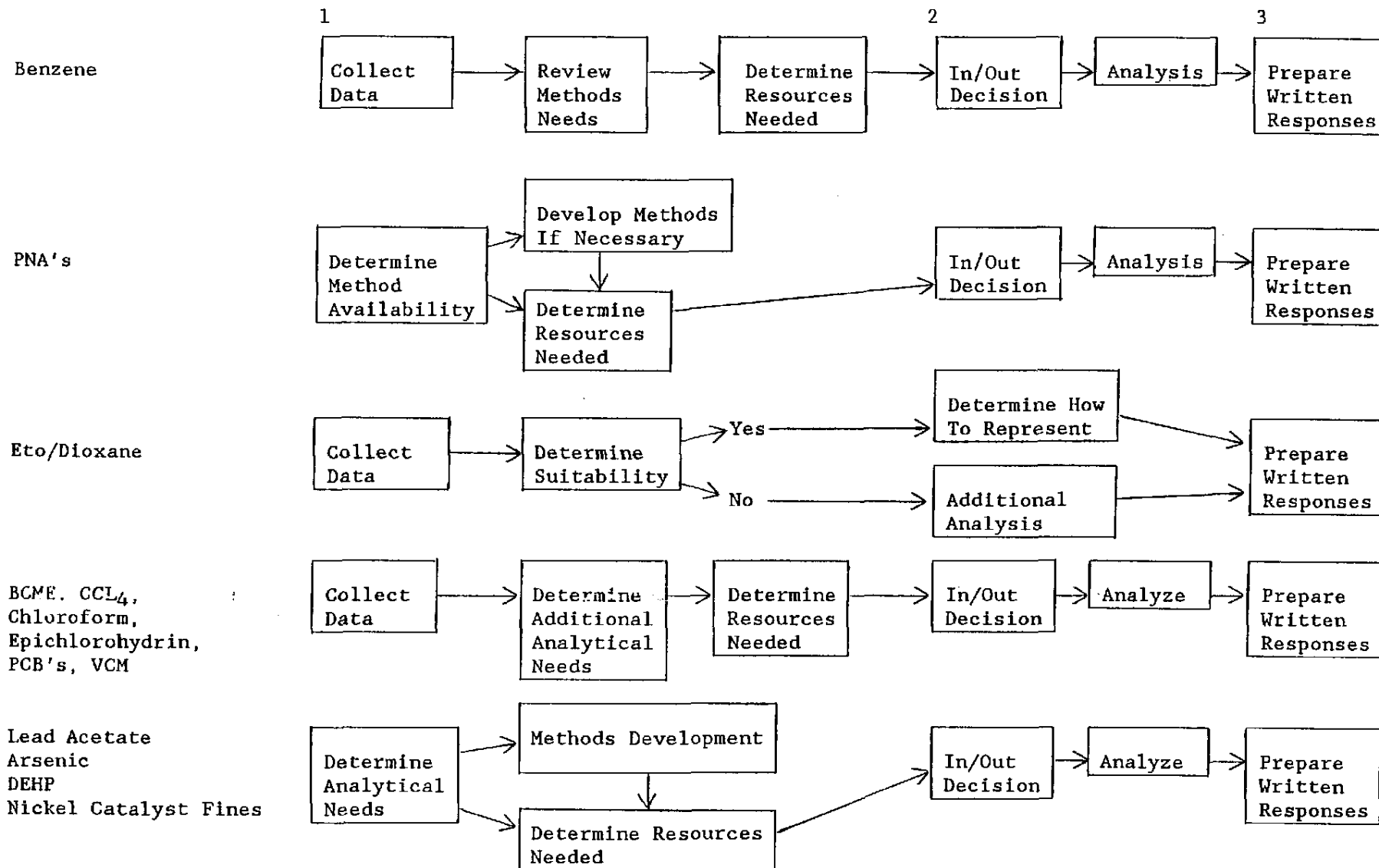
ARSENIC
(3/1/88)

Hydrotropes
AlCl₃
HCL
Sulfonic Acids
Ether Sulfates
Na Salt Slurries
Ether Sulfates

NICKEL CATALYST FINES
(10/1/88)

ALFOLS
ALFONICS
Solvents

VVV 000009917



¹Collect data: Correspond with plants

²In/out decision: decision on whether to use outside contract laboratory

³The end product would be a form or standard response letter