

TO: R. D. Gamblin

TOG: JDL: MMG: RF

XF: TSCA Sect N

FROM: T. G. Grumbles

DATE: August 26, 1985

Interoffice  
Communication

SUBJ: TSCA SECTION 4 TEST RULE FOR C<sub>9</sub> AROMATIC HYDROCARBONS

VISTA

The subject rule requires specific toxicological testing of the C<sub>9</sub> aromatic hydrocarbon fraction that contains ethyltoluenes and trimethylbenzenes as primary components. The rule subjects anyone who manufactures or processes the C<sub>9</sub> fraction, other than as an impurity to the testing requirement.

We have reviewed our manufacturing in relation to this test rule. We do have several hydrocarbon streams at the LCCP that contain C<sub>9</sub> aromatic hydrocarbons in measurable amounts, however, it is our opinion these C<sub>9</sub>'s are present as an impurity. They are not intentionally manufactured, isolated, or processed in any manner. Also, to our knowledge the C<sub>9</sub>'s inadvertently produced have no specific commercial value as a component of the streams. Therefore, Vista is not affected by this rule.

Please let me know if you need further information on the above.

*Tom Grumbles*  
Thomas G. Grumbles *Ajo*

ajo/7

Attachment

cc J. R. Ball  
W. L. McClain

VVV 000016682

EGG: JKL: MMS: RF  
XF: Prod. Liability

TO: Mary Ann Fisher

FROM: T. G. Grumbles  
DATE: August 26, 1985

Interoffice  
Communication

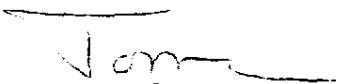
SUBJ: DISTRIBUTOR SALES AGREEMENT

VISTA

Section 6(f) of our standard distributor agreement deals with the distributor duty to practice reasonable efforts to comply with environmental safety, and health standards. Based on the specific requirements for distributors in OSHA Hazard Communication Standard (29 CFR 1910.1200), as described below, would it be prudent to put specific language regarding those regulatory requirements in the agreement language?

Under the standard distributors are obligated to distribute Material Safety Data Sheets to certain customers, and label containers of hazardous materials. We will be notifying them of these requirements in the near future and offering our help in supplying information. However, to afford Vista further protection I would appreciate discussion of adding specific language to our agreements regarding the new OSHA requirements.

Please let me know when we can discuss.

  
Thomas G. Grumbles

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VVV 000016683