

~~FOR JCL: MING: RF~~
KF: None

TO: D. A. Kuhn

FROM: T. G. Grumbles
DATE: February 20, 1987

**Interoffice
Communication**

SUBJ: PROGRESS REPORT FOR THE WEEK ENDING FEBRUARY 20, 1987

VISTA

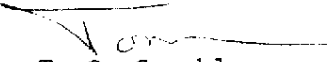
1. Met with Blane Polymers to discuss environmental safety and health projects that need to be done in the near future. We are assisting the plant in preparing to do lead monitoring and developing a lagoon closure plan for submittal to BP.
2. Met with the Mayor and Police Chief of Westlake to discuss SARA - Title III issues and requirements of Title III that will impact the current emergency response committee. They were appreciative of the information but somewhat distressed at the potential need for resources to handle the large amount of information that will be submitted to the local emergency commission.
3. A memo was sent last week recommending that Vista begin labeling PVC product containers with a precautionary warning label. The memo asked for management approval from a broad distribution. Approximately half have responded with approval to date.
4. Met with Engineering to discuss TCLP timing and impact on project schedules.
5. Reviewed Bureau of Alcohol, Tobacco, and Firearms (BATF) to support a possible sale of ALFOL 2.
6. Scheduled an Environmental Audit March 16-18 covering MeCl/Ethoxylate/Paraffins Units and the Lab.
7. Advised 3M of the Food and Drug Administration status of Vista PVC.
8. Reviewed Vinyl Institute draft comments on revisions to the Vinyl Chloride NESHAPS.
9. Submitted comments to EPA on their proposal to ban PVC waste from land disposal.
10. TSCA related research and assistance to customers, the business area and the plants was brisk this week. Specifically, PPG was questioned by the EPA on Vista's use of CAS numbers for various ethoxylates; Engineering needed to know the status of the PMN for octylbenzene sulfonic acid; the PMN for the new NOVEL catalyst was suspended for 15 days due to an error; the PMN for Cl416 Dialkylbenzene was partially completed and sent to Baltimore for completion and submission to EPA; and the need and

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timing for a PMN for the UOP licensed LAB technology was discussed with Paul Warner.

11. Made a joint presentation with Legal to S&T on TSCA compliance as it relates to imports.
12. Researched DOT hazardous materials regulations for LCCP in response to their BOE audit report.
13. Researched Pennsylvania and California hazardous materials regulations for S&T to determine if permits and licenses were required.
14. The Louisiana state hazardous waste tank standards are expected to be issued in draft form next week. Indications are that they will be identical to the federal regulations.


T. G. Grumbles

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