Desk

TO: Distribution

FROM: T. G. Grumbles
DATE: March 21, 1988

VISTA

Interoffice Communication

SUBJ: ANALYTICAL WORK FOR REGULATORY REQUIREMENTS

Based on a review of the list Jim Yates prepared, it is clear that benzene and the PNA's are the chemicals with the potential to appear most often in our products. Therefore, initial efforts should be prioritized towards the analytical work for those two chemicals. From a Proposition 65 standpoint warnings are required now for benzene and will be required beginning in July for the PNA's. If analytical method development is required for the PNA analysis, this should be high priority.

Second in priority, based on regulatory deadlines and product volume in commerce, would be EtO and dioxane. We already know a lot about these levels and additional work may only include data gathering, reviewing sampling frequency, and determining if current sampling frequency allows us to generate representative data.

Third in priority would be the various chlorinated compounds on the Prop 65 list. These are BCME, CCL4, chloroform, epichlorohydrin, PCB's and vinyl chloride. These chemicals have the potential to be present in less volume for commercial purposes, but the warnings will be required in October of this year, except for BCME which is required now.

The remaining analytical needs are for DEHP, nickel catalyst fines, lead acetate and arsenic. Arsenic warnings are required now.

Attached is a suggested "project" organization based on the priorities described. Also, I've listed several general issues that should be considered. It should be noted that some PCB analysis and benzene in LAB work has been done in response to other regulations in the last two years. In several cases, collection of existing data will be our first step. Please review the enclosed then we'll schedule a conference call to discuss details of the project.

T. G. Grumbles

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Enclosure

DISTRIBUTION: Jim Yates
Ron Poe
Charlie Starks

GENERAL ISSUES

- How do we represent the data?

  Ranges, ± 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.

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

BENZENE
(3/1/88)

LAB
Hydrotropes
Specialty Alkylates
$AlCl_3$ 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
$AlCl_3$ 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)	BCME (3/1/88)	CCL_4 (10/1/88)	Chloroform (10/1/88)	PCB's (1/1/89)	VCM (3/1/88)
EDC	MECL	MECL	MECL	EDC	MECL
VCM	VCM	VCM	VCM	VCM	EDC
	EDC	EDC	EDC	PVC	PVC
				LAB's	

LEAD ACETATE
(1/1/89)

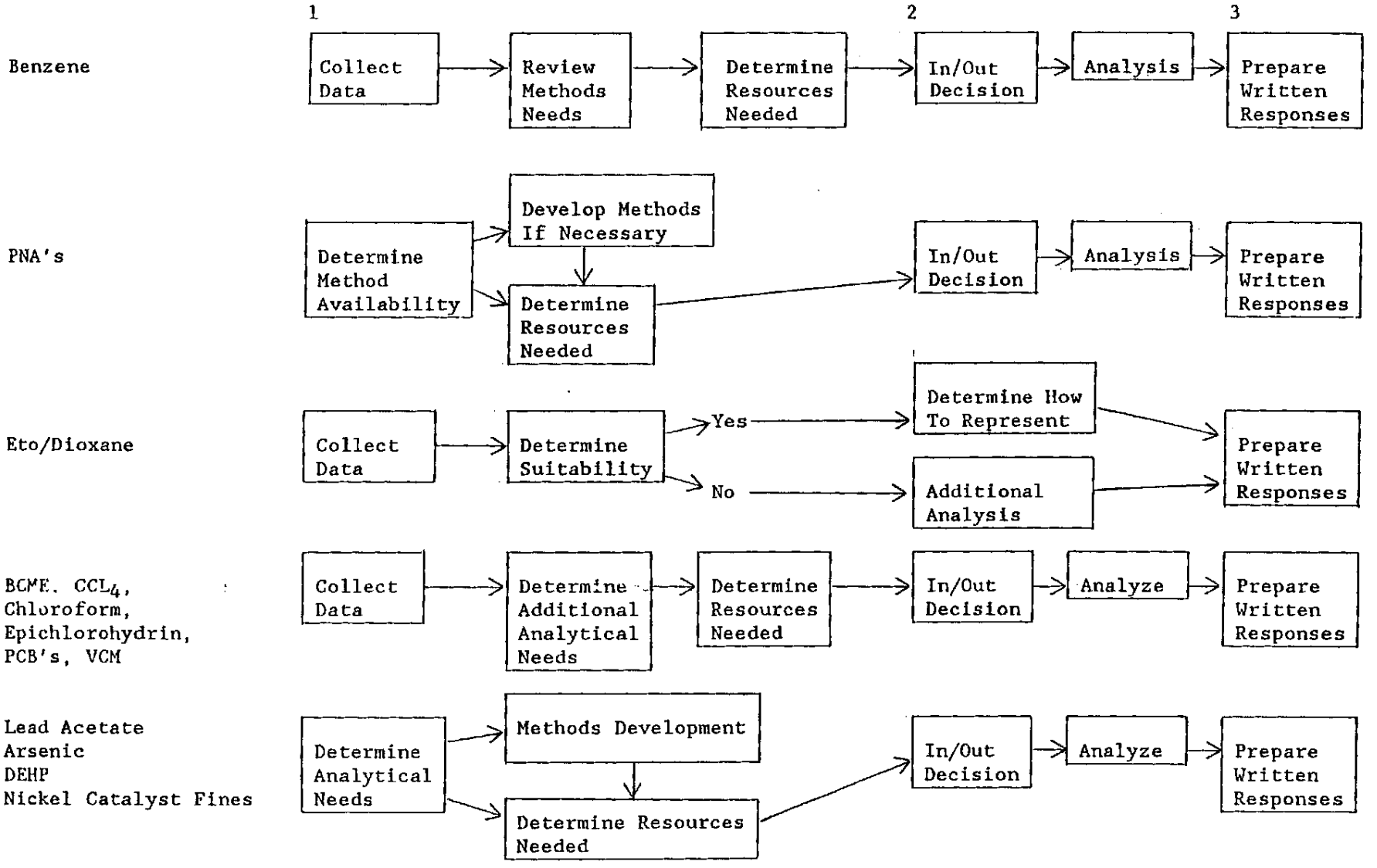
Hydrotopes
$AlCl_3$ Liquor
HCL
Sulfonic Acids
Ether Sulfates
Na Salt Slurries
MECL
Alumina
PVC

ARSENIC
(3/1/88)

Hydrotopes
$AlCl_3$
HCL
Sulfonic Acids
Ether Sulfates
Na Salt Slurries
Ether Sulfates

NICKEL CATALYST FINES
(10/1/88)

ALFOLS
ALFONICS
Solvents



[1]Collect data: Correspond with plants
[2]In/out decision: decision on whether to use outside contract laboratory
[3]The end product would be a form or standard response letter