NALCO CHEMICAL COMPANY
ONE NALCO CENTER ▫ NAPERVILLE, ILLINOIS 60566-1024 ▫ AREA 312 961-9500

JAN - 4 1988

December 28, 1987

MR. JOSEPH L. NIGRO
Technical Sales Representative
Vista Chemical Company
2222 Camden Court, Suite 120
Oak Brook, Illinois 60521

Dear Mr. Nigro:

The State of California has adopted Proposition 65, known as the Safe Drinking Water and Toxic Enforcement Act of 1986. This law prohibits contamination of drinking water by chemicals known to cause cancer or reproductive toxicity, and requires warnings before any exposure to such chemicals.

The information we are requesting might best be handled by your Environmental Affairs Department.

Nalco is determining whether our purchased raw materials contain any of the covered chemicals listed by the Governor of California on February 17, 1987 (see attached). As one of Nalco's principal suppliers, we ask that you review your Material Safety Data Sheets for those materials you supply to Nalco to determine if they provide sufficient information in light of Proposition 65. If not, please amend your Material Safety Data Sheets, and send the updated copies to my attention by January 15, 1988. We ask that you base your review on the criteria provided in Proposition 65 and any subsequent regulations. We also ask that you perform this same review for any chemicals listed by the State of California subsequent to February 17, 1987, and that you modify your MSDS, if necessary, two months before the effective warning date.

Thank you for your assistance with this very important project which will enable us to comply with Proposition 65, and satisfy the needs of our customers.

Please call me, John Kasper, or Graham Jackson at the above telephone number if you have any questions regarding this request.

Very truly yours,

William L. Albrecht
Manager of Purchases

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WLA/lab

Attachment

CHEMICALS KNOWN TO CAUSE CANCER OR REPRODUCTIVE TOXICITY

The Safe Drinking Water and Toxic Enforcement Act of 1986 requires the Governor to publish by March 1, 1987 a list of those chemicals known to the State to cause cancer or reproductive toxicity. Health and Safety Code Section 25249.8(a). The attached list includes all those chemicals which are known to cause cancer in humans as determined by World Health Organization's International Agency for Research on Cancer (IARC) or the United States Public Health Service's National Toxicology Program (NTP). In addition, the list includes the three chemicals currently regulated by the United States Department of Labor's Occupational Safety and Health Administration (OSHA) as reproductive toxicants.

The Safe Drinking Water and Toxic Enforcement Act of 1986 requires that the attached list be revised and republished at least once per year. Therefore, new chemicals may be added to the list based on the recommendations of the Safe Drinking Water and Toxic Enforcement Act Scientific Advisory Panel, changes to determinations of IARC or NTP, or changes to federal OSHA regulations.

Questions about the list or requests for copies of the current list should be addressed to the State's lead agency for implementation of the Safe Drinking Water and Toxic Enforcement Act:

State of California
Health and Welfare Agency
1600 Ninth Street, Room 450
Sacramento, CA 95814

Note: (1) An asterisk (*) indicates that the compound(s) responsible for the carcinogenic effect in humans cannot be specified.

(2) The identification number is the Chemical Abstracts Service (CAS) Registry Number. No CAS number is given when several substances are presented as a single listing.

CARCINOGENS

Chemical	CAS Number
4-Aminobiphenyl	92671
Analgesic mixtures containing phenacetin*	---
Arsenic and arsenic compounds*	---
Asbestos	1332214
Azathioprine	446866
Benzene	71432
Benzidine [and its salts]	92875
N,N-Bis(2-chloroethyl)-2-naphthylamine (Chlornapazine)	494031
Bis(chloromethyl)ether	542881
1,4-Butanediol dimethanesufonate (Myleran)	55981
Certain combined chemotherapy for lymphomas*	---
Chlorambucil	305033
Chloromethyl methyl ether (technical grade)	107302
Chromium and certain chromium compounds*	---
Coke oven emissions*	---
Conjugated estrogens*	---
Cyclophosphamide	50180
Diethylstilbestrol	56531
Melphalan	148823
Methoxsalen with ultraviolet A therapy (PUVA)	298817
Mustard Gas	505602

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2-Naphythylamine	91598
Soots, tars and mineral oils* (mineral oils may vary in composition, particularly in relation to their content of carcinogenic polycyclic aromatic hydrocarbons)	---
Thorium dioxide	1314201
Treosulfan	299752
Vinyl chloride	75014

REPRODUCTIVE TOXICANTS

1,2,Dibromo-3-chloropropane	96128
Ethylene oxide	75218
Lead	7439921

HAZARD DETERMINATION FOR VISTA LPA SOLVENTS

LPA Solvent is a hydrotreated, predominately napthenic hydrocarbon solvent. Based on our hazard determination, under OSHA's Hazard Communication Standard (29 CFR 1900.1200), LPA and LPA 140 present both a physical and a health hazard and LPA 200 presents a health hazard. Vista LPA Solvents do not require carcinogenic warning labels.

A chemical is considered a physical hazard if there is scientifically valid evidence that it is a combustible liquid, compressed gas, explosive, flammable liquid or solid, organic peroxide, oxidizer, pyrophoric, unstable (reactive), or water-reactive. LPA and LPA 140 Solvents are combustible liquids due to their flash points of less than 200°F. The flash point of LPA 200 exceeds 200°F and is not a physical hazard by definition.

A chemical presents a health hazard if one statistically significant study done in accordance with established scientific protocol indicates an effect may occur in exposed populations. Based on acute mammalian testing done on LPA; including dermal LD_{50}, primary skin irritation, primary eye irritation, inhalation LC_{50} for 1 hour exposures, and oral LD_{50}, the LPA Solvents have been determined to be irritants.

LPA Solvents contains no OSHA defined carcinogens at levels greater than 0.1%. As for the broad categories of "mineral oils", petroleum oils, or other generic classifications of oils which have been indicated to have a carcinogenic potential by various studies we believe the following to be true in respect to LPA Solvents. IARC Monograph 33, a compilation of carcinogenic evidence for Mineral Oils (lubricant base oils and derived products) classifies the carcinogenicity of petroleum derived oils based on the increasing severity of processing or refinement. This monograph deals with oils that are predominately lubricant base oils with initial boiling points exceeding 750°F and having carbon number distributions of 15 to 50. The monograph also lists specific oils as defined by CAS numbers assigned by the U.S. EPA. LPA Solvent has an IBP of 370°F and has a carbon number distribution predominately in the C_{12}-C_{16} range. Also the CAS number descriptive of Vista's LPA solvents is not listed in the monograph. Based on these facts, Monograph 33 does not contain evidence relevant to the LPA Solvents.

Of those oils discussed in the monograph, the LPA Solvents are closest to the white oil (Class 5) classification, for which the only evidence for carcinogenicity is of questionable significance to human exposures.