

Interoffice
Communication

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: June 15, 1990

SUBJ: PROGRESS REPORT

VISTA

1. JCL reviewed the OKC South Pond RCRA closure equivalency request and provided comments to the plant.
2. The basis for the proposed Blane wastewater permit limits for copper and lead was discussed with EPA Region I.
3. LCCC received its draft 304(1) Individual Control Strategy. JCL discussed the basis with EPA Region VI and advised the Plant and R&D of changes in the biotoxicity test species. A meeting with EPA will be scheduled once we better understand our options and capabilities.
4. JCL participated in the CMA Phthalate Esters Panel Meeting. Vista has committed to become a member of the panel to facilitate tracking of regulatory activity on phthalates and alcohols sold into the phthalate market.
5. JCL participated in a meeting with Aristech to inform them that submission of a SARA 313 delisting petition to EPA was being put on hold pending other regulatory developments. It was agreed to continue gathering data necessary to write a petition. A decision a petition submittal will be reevaluated toward the end of the year. A letter to Aristech was drafted committing Vista to the data gathering.
6. ERT and MJH presented a transportation seminar for various company representatives. Topics included upcoming domestic and international regulations, Vista DOT training and program assessment, and CMA's Responsible CARE Code of Management Practice for distribution.
7. The DOT team met with Mr. Louis Richard, Jr. of the Bureau of Explosives (BOE) regarding BOE's services for plant audits.
8. ERT chaired Louisiana Chemical Association task force to develop a position paper on groundwater protection in Louisiana. We drafted an outline that we will further develop.
9. An environmental audit at Premiere.
10. MJH participated in Environmental Awareness Training for surfactant Technical Sales Representatives at the Saddlebrook Office.

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11. Transitional packaging for international shipments runs out at the end of the year. Beginning next year, all packages shipped internationally must meet the UN's performance-oriented packaging requirement. HM-181, which will adopt these standards for domestic shipments, is expected out sometime this fall.
12. 31 COEDS ordered MSDS's were sent out.

Tow

T. G. Grumbles

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