

VISTA CHEMICAL COMPANY STATEMENT
REGARDING APPLICABILITY OF OSHA ETHYLENE OXIDE STANDARD
TO WORKPLACES UTILIZING VISTA ALFONIC ALCOHOLS

We believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). Vista Chemical Company produces ethoxylates in our Lake Charles Chemical Plant. At that plant, after production, we have storage, railcar loading, and drumming personnel who handle the ethoxylates. During the operations described above, measurements have been made on personnel to evaluate ethylene oxide airborne concentrations in the areas of processing and handling. The results of these measurements indicate that overall personnel exposures in those areas are below the 0.5 ppm eight-hour time-weighted average Action Level specified in the OSHA Ethylene Oxide standard. Following is a summary of these measurements and how they were obtained.

DATA SUMMARY

In 1983 and 1984 nine personal samples were taken to evaluate ethylene oxide exposures to personnel directly involved in handling ethoxylated products. These operations predominately involved loading of railcars and drums. Samples were taken during those specific operations and range in length from one hour to four hours. Results of these samples indicate all exposures to be below 0.5 ppm. The highest sample was 0.4 ppm and all others were below our analytical detectable limits of 0.2 ppm.

ANALYTICAL TECHNIQUE

The samples discussed above were analyzed by a modified Quazi-Ketchan method. An SKS Quazi-Ketchan charcoal adsorbent tube was used to obtain the air sample. The sample was then desorbed with carbon-disulfide and analyzed via head space gas chromatography.

After manufacture of ethoxylates there is a potential for trace amounts of EtO to remain in the liquid ethoxylate. Our manufacturing practices are structured to reduce this residual to the lowest levels practicable. However, you should be aware that under certain conditions this residual EtO may accumulate in tank vapor spaces or other confined spaces. In the unexpected event of entry into these spaces, proper ventilation or other protective measures should be employed.

Based on the data above obtained during the operations we described, we believe that the ethoxylated alcohols you purchase from us are exempt as described in the OSHA Ethylene Oxide Standard, 49 CFR 1910.1047(a)(2). However, we do not know the specific ways you store and handle these products in your workplace. If they are significantly different than those we have described and evaluated, we recommend you make personnel measurements in your workplace as described in the standard.

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