

Vista Chemical Company

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Houston, Texas 77224
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September 4, 1990

TGG: JCL: ERT: ~~THH~~: AJO: RF

XF: ADAR

VISTA

Mr. Bob Leitman
Lewis Harris & Associates, Inc.
630 Fifth Avenue
New York, New York 10111

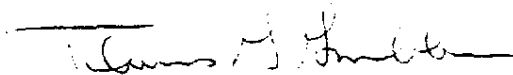
Dear Mr. Leitman:

This letter is to inform you that Vista Chemical has carefully reviewed our original refusal to participate in the additional element of the John Gray Institute study described in your July 10, 1990 letter. This request was sent to two of our manufacturing locations that participated in the initial portion of the study.

After careful review with corporate and plant management Vista is declining to participate. In summary we simply have too many concerns regarding employee reaction to the company providing the personal information requested. Vista does not provide this type of employee information to outside sources and even though we understand it would be held confidential, the intended purpose cannot rationalize providing it in this instance.

Please contact me at 713-588-3445 if you have further questions.

Sincerely,



Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

cc: Don Hulin - CMA
RDG, THH, JAD, HDG, RWS

VVV 000013631

TO: Chris Pierson

FROM: T. G. Grumbles
DATE: September 4, 1990

Interoffice
Communication

SUBJ: LEL'S FOR VISTA SOLVENTS

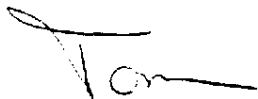
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VISTA

The estimated values in WLS's memo of 8/28 are significantly different from the values we currently use on our MSDS's. We need to confirm what values we believe are most accurate and make changes where necessary.

If R&D believes the calculation method described in Wayne's memo will produce accurate estimates, we should do that and document the determinations.

If not, maybe we could measure several solvents and interpolate data for the rest. Either way, we need accurate documented values for the MSDS's and other product literature. This should be done as soon as reasonable.



T. G. Grumbles

dlj

cc: MJH, JFL, SLB, WLS

VVV 000013632

**Interoffice
Communication**

TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: September 7, 1990

SUBJ: PROGRESS REPORT

VISTA

1. CLER met with Procter & Gamble to discuss each other's position on tetralins. P&G recognizes that tetralin concentrations in the environment are well below any observable toxic effect level. However, they are concerned about the apparent very slow biodegradability of tetralins. Oleochemical producers could use this issue to attack LAS. Nothing was resolved in the meeting. We had a good open discussion and will likely need to have more of the same in the future.
2. JCL provided information to Mark Eramo on lead legislation in preparation for his meeting with Southwire.
3. A letter to selected Senators and Congressmen was drafted for Plant Managers with comments on the proposed Clean Air Act. Vista's position is based on information and suggestions provided by CMA
4. A conference call was held with Aristech regarding the SARA 313 delisting petition for di-n-octyl phthalate. Work continues to develop background information. We will likely meet with EPA in October to discuss the information we have and get a feel for our chances of delisting DNOP.
5. The DOT Team met to discuss upcoming training and plant assessments. DOT general awareness sessions will be held for S&T on September 18th and 27th. A plant assessment will be performed at Baltimore in mid-October.
6. The HM-181 Team held its initial meeting with representatives from Environmental, Manufacturing, R&D, S&T, and International Operations. The purpose of the Team is to develop compliance measures regarding massive upcoming changes in the classification, packaging, and hazard communication for hazardous materials transportation. These changes will have a significant effect on sample shipments as well as rail, cargo tanks, and drums.


T. G. Grumbles

dlj

VVV 000013633