

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079-2990
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224-9029
Fax (713) 588-3236

April 1, 1991

TGG: JCL: ERT: MJH: AJO: RF

XF: 283.5

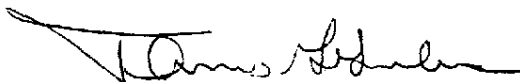
VISTA

Mr. Vincent F. Zedler
Manager, Purchasing
Lederle Laboratories
Pearl River, NY 10965

Dear Vincent:

This letter is in response to your request for information regarding the presence of TC listed chemicals in Vista's Muriatic Acid. This product contains no TC listed chemicals above the regulatory thresholds. Please refer to our MSDS for this product for additional waste classification information.

Sincerely,



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

dlj

VVV 000006240



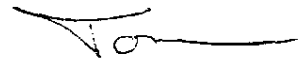
Interoffice
Communication

To: R. D. Gamblin
From: T. G. Grumbles
Date: March 28, 1991
Subj: **PROGRESS REPORT**

1. JCL attended a workshop held by CMA on the recently negotiated regulation to reduce emissions from equipment leaks (valves, pumps, compressors, etc.). Representatives of EPA, industry, state and local regulators, and environmentalists negotiated this rule. It will be proposed in November and promulgated in November, 1992. The rule lowers the definition of a leak from 10,000 ppm to 500 ppm and requires an extremely onerous leak reduction program if the percentage of valves leaking exceeds 2% or the number of pumps leaking exceeds 10%. The message at the workshop was to start getting leak rates down below these levels so that when the rule is finalized, we do not need to implement EPA's leak reduction program.
2. JCL worked with Public Relations on preparations for focus group meetings at LCVCM on April 1 and 2. The intent of the meetings will be to obtain guidance on the plant environmental program communication, what and how to communicate.
3. JCL made final preparations for environmental awareness training at LCCC April 4 and 5.
4. JCL provided concurrence to Engineering on routing of the treated wastewater discharge line to the Calcasieu River underground.
5. JCL met with Conoco, Sun Polymers, and Royal Plastics on the project to recycle PVC buried at Aberdeen in former Pond 2. The plan is to meet with Mississippi DEQ to obtain their concurrence that recovery of this material is considered product recycle and not a regulated waste activity.

VVV 000006241

6. JCL participated in conversations regarding the minor plasticizer soil contamination at Premiere. In conjunction with outside and in-house counsel, determined that no action was necessary.
7. JCL talked to Oxy, BFG, and Dow regarding their handling of VCM plant cracking furnace decoking waste. Memos were issued documenting those conversations.
8. TGG made a presentation to the Quality Coordinators meeting on the similarities in the OSHA Process Safety Standard and the ISO 9002 Quality Standard.
9. Ann Clark has been hired to fill the vacant Product Safety Specialist job. The transfer from marketing will be effective April 15.
10. A plan to develop a safety and health audit program has been developed and approved. Work is beginning on developing the audit modules by regulatory and program areas, the scoring system, and program administration documents.



T. G. Grumbles