

Interoffice
Communication

VISTA

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: June 15, 1990

SUBJ: PROGRESS REPORT

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.

Tom

T. G. Grumbles

dlj

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Interoffice
Communication

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: July 27, 1990

SUBJ: PROGRESS REPORT

VISTA

1. JCL participated in CLER meetings with Lever and Colin A. Houston Associates to review the environmental safety status of LAS. Tetralins were a significant discussion item. Both Lever and CAHA encouraged CLER to learn more about the fate of tetralins and communicate that information to appropriate audiences. It was recognized that Procter & Gamble is playing a leading role on this issue.
2. EPA issued minor revisions to the VCM NESHAP which affects OKC, Aberdeen, and LCVCM. The impact at all three plants is administrative only. A memo was issued summarizing the revisions.
3. JCL issued guidance to LCLAB regarding the "point of generation" of benzene contaminated wastewater as regulated under the Benzene Waste Operations NESHAP.
4. The Aberdeen Superfund site assessment plan was reviewed and comments provided to the contractor, DuPont Environmental Remediation Services. Aberdeen received the order from the State of Mississippi DEQ requiring the plant to submit a site assessment plan within 30 days. The DERS work will be used to comply with the state order.
5. JCL advised the Blane waste site contractor, Weston & Sampson, of the appropriate land disposal restriction provisions covering disposal of soil contaminated with plasticizers. Soil contaminated with plasticizers can be landfilled without pretreatment until June 8, 1991.
6. JCL consulted with LCVCM regarding the regulatory status of recovered groundwater and the options available to treat it.
7. JCL consulted with LCCP regarding the impact of the Distillation New Source Performance Standard on the Plant.
8. EPA plans to issue a notice in late 1990 detailing their plans and timetable for issuance of a TC Land Disposal Restriction. Speakers at a recent CMA seminar predict that the TC LDR will be promulgated by mid-1992. The current LCCC wastewater project timetable assumes that the LDR won't be promulgated until 6/93. We are following this closely but likely won't have more definitive information before the end of the year.

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The promulgation timetable could be significantly altered if an environmental group (EDF) sues over EPA's slow progress on the LDR.

9. The Premiere Polymers environmental audit report was finalized. The plant is to be commended on their efforts towards environmental compliance.
10. Vista's response to the CMA Toxic Release Inventory was submitted to the CMA. This inventory consists of Vista ARA 313 notifications for 1987 through 1989.
11. The last date for submitting Vista's products for inclusion on the Canadian Domestic Substances List (DSL) is August 10, 1990. All Vista products used or sold in Canada between 1/1/84 and 12/31/86 must be on this list to continue in Canadian commerce after January 1991.
12. 22 COEDS ordered MSDSs were sent out.

T. G. Grumbles

T. G. Grumbles

dlj

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