

November 1, 1990

via fax

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TGE: JEL: ~~EXT~~: ~~NEH~~: AJQ: RF
XF: none

VISTA

Dear Katie:

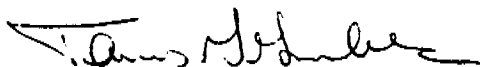
Below are Vista's comments on the draft "Glycol Ethers" survey.

I believe the cover letter may not be persuasive enough for those companies that have not been involved in this arduous process. Despite the multiple SDA alerts, many may not have heard of this issue, understand it's impact, or in fact, ever calculated emissions for 313 reporting. Based on these concerns, I think we need to have some more verbiage in the cover letter requesting participation.

Specific comments on the survey form:

1. We need to specify a time-frame for the emissions, i.e. CY 89. This should be consistent with a 313 reporting year.
2. The "site identifier" element is confusing and I'm not sure it will be useful without some guidance or pre-numbered forms.
3. If companies utilize the SDA inventory nomenclature for ethoxylated alcohols, the hydrophobe name will likely be the same for multiple products. In this case, grouping of emission numbers should be allowed.
4. Ethoxylate is misspelled in Item 4.
5. For purposes of the chart, it is not clear if the total of the 1, 2, and mole ethoxylates should be "lumped" or if individual sheets should be completed for each.
6. Item 6 and 7 ask for annual production. I'm sure most people have variable production rates. These questions should indicate "average" production for a defined period, i.e. 3 years.

Sincerely,



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

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