

Vista Chemical Company

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

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

February 5, 1991

TGG: JCL: ERT: MJH: AJC: RF

XF

VISTA

Mr. Jack White
Vinylume
4021 Mahoney Avenue
Youngstown, Ohio 44515

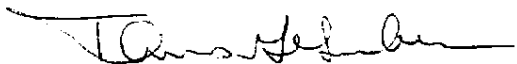
Dear Jack:

As we discussed on the phone, I believe simply providing an MSDS for the compound we sell to you would be an inaccurate representation of the health and environmental hazards of the finished products you produce from the compound. We provided you with a SARA 313 notification based on the content of our compound. However, your product probably has little potential to result in an environmental release of any 313 listed materials, specifically metals. Therefore, you may be exempt from any SARA 313 notifications. I have attached information on the 313 customer reporting requirements for your review.

Also, the waste classification of the product, or scrap from working the product is determined by a water leaching test, the "TCLP". Wastes with smaller particle size are more likely to allow hazardous constituents to leach into solution during the Toxicity Characteristic Leaching Procedure (TCLP). The TCLP is used to determine whether a waste is hazardous according to the Toxicity Characteristic (TC). Vista has no quantitative data demonstrating PVC compound to be hazardous. We have anecdotal information regarding PVC compound pellets containing lead. The pellets do not fail TC. However, a wire recycling facility reports that the finely chopped fluff generated at their facility does sometime fail TC. This fluff is a much smaller particle size than the pellets.

I would recommend you have some TCLP tests run on representative scrap from working your product to assure that the material would not be classed as hazardous according to the TCLP test. We can get you information on testing facilities in your area if you need.

Sincerely,



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

dlj

Attachment

cc: Bob Schettek-Saddlebrook

VVV 000011754

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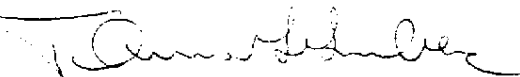
Mrs. J. Abbott
Department of Energy
1 Palace Street
London SW1E 5HE

Dear Mrs. Abbott:

In response to your letter of 14 December 1990 regarding what base oils Vista Chemical Company supplies, please be advised Vista supplies ODC and ODC 210.

I have attached copies of the acceptance letters for both oils.

Sincerely,



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

dlj

Attachment

VVV 000011755



Department of Energy

PETROLEUM ENGINEERING DIVISION
Thames House South Millbank London SW1P 4QJ

Telegrams Energy London SW1
Telephone Direct Line 01-211 6106
Switchboard 01-211 3000

Vista Chemical Co
Industrial Hygiene and
Product Safety
PO Box 19029
HOUSTON
Texas 77224
USA

Your reference

Our reference *SC/734/1*

Date *26* January 1988

Dear Sir/Madam

BASE OILS

ODC 210 may now be added to the Department of Energy's list of oils accepted for use on the UKCS. They will be added to the list at the next revision.

Yours Faithfully

Phil Cawse

PHIL CAWSE

RECEIVED

FEB 01 '88

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VVV 000011756



Department of Energy
Petroleum Engineering Division

Thames House South Millbank London SW1P 4QJ

Telegrams Energy London SW1
Telephone Direct Line 01-211 5669
Switchboard 01-211 3000

Mr T G Grumbles
Director, Industrial Hygiene
& Product Safety
Vista Chemical Co
PO Box 19029
Houston TX 77224
USA

Your reference

Our reference 80/729/12

Date 20th June 1985

Dear Mr Grumbles

We have now received the toxicity test report on VISTA ODC base oil and will raise no objection to its use in the formulation of oil-based muds for use on the UK Continental Shelf.

Yours sincerely

D R Bedborough

VVV 000011757