

Vista Chemical Company

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XF: Cheney Response

November 22, 1985

Mr. Ron Bland
Huges Drilling Fluids
10777 Northwest Freeway
Houston, TX 77092

VIST

Dear Ron:

This letter is to confirm our discussion regarding the labeling of Vista's ODC Drilling Fluid Base Oil and our hazard determination. You are aware of the OSHA Carcinogenic warning labeling requirement which applies to materials which have been evaluated under valid testing conditions and shown significant positive results or for those which have not been tested but contain greater 0.1% by weight or volume of a known carcinogen. Known carcinogens are defined as those chemicals listed by the National Toxicology Program (NTP) International Agency for Research on Cancer (IARC) Groups I and II, and those which OSHA regulates as a Carcinogen. In some cases evaluation of IARC listed categories is required to determine specific chemicals.

Vista ODC contains no OSHA defined carcinogens, for purposes of the Hazard Communication Standard, at levels greater than 0.1%.

As for the broad categories of "mineral oils", petroleum oils, or other generic classifications of oils which have been indicated to have a carcinogenic potential by various studies we believe the following to be true in respect to Vista ODC. IARC Monograph, Volume 33 (portions attached) classifies petroleum derived oils based on the increasing severity of processing or refinement.

This monograph deals with oils that are predominately lubricant base oils with initial boiling points exceeding 750°F and carbon number distributions of 15 or greater. Vista's ODC has an IBP of 370°F and has a C₁₂-C₁₆ carbon number distribution.

Of those oils discussed in the monograph Vista ODC is closest to the white oil (class 5) classification, for which the only evidence for carcinogenicity is of questionable significance to human exposures.

Sincerely,



Thomas G. Grumbles, CIH
Environmental Quality Manager

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Attachment
cc Dan Plummer, John Nelson, Pat Quinlan