

Interoffice
Communication

TO: Distribution

TGG: JCL: ERT: MJH: AJO: RF

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FROM: T. G. Grumbles
DATE: August 22, 1990

VISTA

SUBJ: VPSAG MEETING MINUTES OF JULY 25, 1990

The subject meeting was attended by Lee Matheson, Allen Nielsen, Curt Elsik, Diana Fenton, Bill McClain (part-time) and myself. An agenda for the meeting is attached.

1. The first hour of the meeting was spent reviewing our duty to test new products and the regulatory and liability concerns in polymers product development. John Kirkpatrick, Bud Hall, Ken Mieure, and Steve Hookansen attended this portion of the meeting.

Bill McClain reviewed the legal issues involved in our "duty to test". The concerns and needs for new polymers product development were reviewed including regulations, codes (NSF, UL, etc.), and general liability issues based on the prevalence of TSCA 8(c) allegations involving polymers. The basic issue of how to get polymers into the new product development process was discussed.

The issue of how to define a "new" product was discussed. It was generally felt that a scheme utilizing ranges or classes of products could be developed.

The standard of an "expert" that we would be held to when offering detailed technical information on processing was also discussed in view of our recent development of such literature.

Action Items resulting are as follows:

1. WLM and TGG will address polymers management team as soon as Kirkpatrick can obtain some agenda time.
2. Bud Hall will explore providing VPSAG a technical seminar on polymers, similar to the one-day overview training.
3. John Kirkpatrick will nominate a replacement for Diana Fenton on VPSAG for polymers.
4. TGG will write Kirkpatrick a memo on the need to address the Polymers Management Team.

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2. Update and Review of Current Activities

A. Surfactants

1. The development of ether sulfates by 3M as a component in fire suppression systems has slowed somewhat. 3M has informed us that they will do testing on the finished product, but will expect appropriate data on the MSDS. Based on that, the VPSAG testing recommendations previously made will stand as is.
2. Three specialty alkylate streams, (V-150, V-7060 LO, and V-160L) are currently undergoing chemical and physical testing. This data will be used to assist in making a determination on testing needs.

Action Item: Lee Matheson will provide Dave Penney with the data when available.

3. The drum drying volatility issue at Pilot Chemical was discussed. An 8(c) form has been received on this and an investigation by R & D is ongoing to assist Pilot in determining thermal decomposition products in their process. No action by the committee is necessary at this time.
4. The ethoxylate grid testing status was reviewed. The entire set of grid samples has been sent to Stillmeadow and testing is underway. (See DAP 6/25 memo attached).

Action Item: Dave Penney will obtain samples of grid products for biotoxicity testing in Austin.

5. Formal linked ethoxylates development work was reviewed. Biodegradation work is underway on 4 samples. These products are probable candidates for PMN's and VPSAG will continue to advise on the timing and data needs.

We will also need to do a thorough, quantitative hazard assessment based on the potential for formaldehyde generation.

B. Alumina

1. Dave Penney has done preliminary literature searches on cerium and lanthanum, the materials to possibly be used in "doped" alumina production. He has also talked to producers about getting further information. No significant issues or concerns yet.
2. The completed Boehmite alumina testing was reviewed. The results indicate little or no toxicity or sensitization potential. The results will be presented

in some fashion to the LCCP employees involved in the 8(c) allegations and MSDS will be revised with the new data.

Action Items:

1. Dave Penney will provide MSDS text to TGG.
2. TGG will determine how LCCP wants to present info to employees.
3. TGG will work with the business area to communicate results to customers.
3. The issues and concerns involved with future marketing plans for alumina were reviewed specific to a memo written by Steve Baxter on 6/19/90 (attached). There was some concern expressed by TGG regarding the extent of testing suggested for oral applications, based on our knowledge of the acute toxicity of alumina. Dave Penney will address this specific issue in a memo.

Action Items:

Dave Penney will write a memo on oral applications and toxicity evaluation needs and distribute to VPSAG and the distribution in Baxter's memo.

4. There is a need to specifically review the inhalation testing needs for GST alumina. This is based on our new toxicity info on Boehemite and GST's particle size.

Action Items: Undecided

C. Solvents

1. Joe Lopez has approved the solvents testing recommended in Dave Penney's June 26th memo. A copy of the "grid" is attached.

3. New Topics

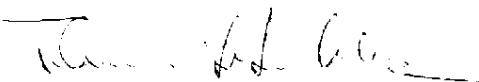
- A. The recent Canadian SPI report on encapsulation of lead stabilizers in compound, was discussed in terms of it's significance to Vista and the potential need for MSDS modifications.
- B. A recently received report on PVC ingestion done by Malton was discussed. This study was a one year feeding carcinogenicity study that had negative results. Dave Penney had some protocol questions on the study design that in his mind limit the significance of the study. No further action is anticipated.
- C. The distribution of the routine literature searches being done by R&D was discussed.

Action Item: Dave Penney will circulate the reports to VPSAG for review, and applicable references will be obtained.

D. There is still a need to circulate the revised VPSAG Charter and guidelines to appropriate management.

Action Item: TGG and DP will do.

Next meeting date is October 12.


T. G. Grumbles

dlj

Distribution: VPSAG List

Dave Penney, A. M. Nielsen, J. R. Roheim, Diana Fenton, Lee Matheson, Curt Elsik-Austin

W. L. McClain

VVV 000013467

Interoffice
Communication

To: VPSAG Members
From: D. A. Penney *DP*
Date: June 25, 1990
Subject: **ALFONIC® ETHOXYLATE TEST GRID**

VISTA

L. Matheson is coordinating the production of ALFONIC ethoxylate samples for toxicity testing. The materials to be produced are:

C810-40,60,70
C1214-20,40,60,70
C1618-60 & 70

The purpose of this testing is to generate a base data set for use in interpolating for other ethoxylates. This may decrease or even eliminate the need for testing of some ethoxylate products developed in the future. Another benefit of these tests is that, in most cases, the results of this study could be extrapolated to the Novel analogues since the Novels are "purer" versions of the same product.

Each sample will be prepared by successive ethoxylation of the original alcohol in the 2 gallon reactor in the surfactants area. The ratio of the alcohols will be approximately 50:50. Each sample will be submitted to analytical for verification of composition prior to safety testing.

Initially, the following material will be submitted for safety studies:

C810-40 & 70
C1214-20 & 70
C1618-60 & 70

The studies to be conducted on each of the above samples are acute oral toxicity, ocular irritation and dermal irritation. It may be found necessary to do additional testing on some of the other homologues once the initial results are available.

It should take about a month to produce and analyze the samples and probably another two months to complete the safety studies on the series at a total cost of approximately \$9,000.

CC: T. O'Brien
J. Roheim
M. Sweet
W.J.B. Vogel

VVV 000013468

Interoffice
Communication

To: Distribution
From: D. A. Penney *DP*
Date: July 25, 1990
Subject: **VPSAG MEETING AGENDA**

VISTA

The next Vista Product Safety Assessment Group(VPSAG) meeting is scheduled for Friday, August 3, 1990, from 8:00 a.m. until 11:30 p.m. in Room 1229 at the R&D facilities.

Tentative Agenda

<u>TOPIC</u>	<u>TIME</u>
1. Appoint scribe and review agenda(DP)	8:00
2. New product development program(DP/TGG)	8:05
3. Duty to test(BMcC)	8:20
4. Review issues in recent developmental activities(TGG)	8:35
5. Discuss potential solutions(ALL)	8:50
6. Break(ALL)	9:05
7. Review action steps from previous meeting(DP)	9:10
8. Update and review of current activities	
Solvent testing(DP)	9:20
Alumina	
Catapal studies(DP, TGG)	9:25
personal product safety testing(DP)	9:40
whiskers, data submissions(Prop 65) and studies in progress(DP)	9:55
Surfactants	
ethoxylate grid(DP)	10:05

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whole bottoms(DP/KLM)	10:10
Chemical Safety Evaluation Criteria document(DP/TGG)	10:25
9. New topics	
Doped- aluminas(DP/TGG)	10:30
Report on encapsulation of lead chromate(TGG)	10:50
Review PVC rat study(TGG/DP)	11:05
10. Review of Action items and set next meeting(scribe/DP)	11:30

Please let me have your suggestions for revising this agenda.

Distribution: L. Matheson, A. Nielsen, C. Elsik, D. Fenton-Austin
T. Grumbles, W. McClain-Houston

CC: J. Roheim-Austin

VVV 000013470

Interoffice
Communication

To: Distribution

From: S. L. Baxter, R&D, Austin

Date: June 19, 1990

Subject: Toxicity testing for CATAPAL® and DISPAL® Aluminas

VISTA

In response to an action item from our last Alumina Review Meeting, a conference call was held with Dave Penney and Steve Baxter of R&D, and Jim Hackett and John Nelson of Market Development. The objective was to outline the toxicity testing needed for CATAPAL® and DISPAL® aluminas. In particular, we desired to outline a program that would reveal any differences in toxicity due to the product parameters that are typically modified to make different products. In this way we hoped to get enough data to make future generalizations that could minimize additional testing of new products.

The basic tests required are a function of the expected end-use application. The basic tests required are given below:

1. Industrial applications (catalyst support, paper treating, etc.)
 - a. eye and skin irritation
 - b. oral and dermal toxicity (single exposure)
 - c. optionally, inhalation irritation (We'll have a better idea about this after we review the inhalation irritation results from testing in progress.)
2. Dermal applications (cosmetics)
 - a. all of the above
 - b. sensitization studies
3. Oral applications (toothpaste, liquid medication, etc.)
 - a. all of the above
 - b. teratology
 - c. repeat oral toxicity evaluation

The basic battery for industrial applications costs about \$2500 per sample, and takes about 6 weeks. Inhalation irritation costs about \$2500 more. Sensitization testing costs an additional \$2500 and requires two months. Teratology and the oral toxicity evaluation cost \$125,000 per sample and require six months. The consensus was that only the industrial applications and dermal applications testing would be performed (eye and skin irritation, oral and dermal toxicity, and sensitization for a total cost of \$5000/sample).

In light of changes in current toxicity testing protocols, it was recommended that CATAPAL® A and D aluminas be subjected to this battery. Since trace

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Distribution
June 19, 1990
Page 2

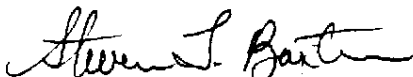
impurities can affect toxicity results, it was decided that we would identify samples of high TiO_2 and % carbon for use in these evaluations.

After reviewing the differences in our various DISPAL® alumina products, we agreed on the following testing schedule to explore the effects of crystallite size and acid level:

	<i>Solution 50 ml 100 pH</i> 2XN4-20	<i>powder 100 ml</i> 2XN4-80	11N4-25	11N4-80
Oral & dermal toxicity	X	X	X	X
Eye & skin irritation	X	X	X	X
Inhalation irritation		X		X
Sensitization	X		X	

Action Items

1. SLB review recent LCCP alumina production for TiO_2 and % carbon, and create a histogram to aid in selection of CATAPAL® A and D samples.
2. DAP provide a cost estimate for the proposed testing.


Steven L. Baxter
Chemicals Technology

jms

cc: DAP, JFN, JLH, JRR, RLP,
GSH, JTF, DJL

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8/3/90

SOLVENTS TESTING						
PRODUCT	RET	RST	AOT	ADT	AIT	COMMENTS
MR/ODC15	X	X	X		X	ND, ↑ Aromatic vs. LPA
LPA					X	Vista data OK, upgrade for AIT needed
LPA 140	X		X		X- Pending LPA results	ND, somewhat similar to LPA
LPA 130	X	X	X		X	ND, first half of LPA 140
LPA 170	X	X	X		X	ND, second half of LPA 140
LPA 210	X		X			ND, less similar to LPA than LPA 140
N500/LPA 130 210	X	X	X	X	X	Per agreement with customer (Moore Business)
	+ guinea pig sensitization					

RET - Rabbit eye test
 RST - Rabbit skin test
 AOT - Acute oral testing
 ADT - acute dermal testing
 AIT - acute inhalation testing

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