

Vista Chemical Company

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TGG: JCL: ERT: MJH: AJO: RF

XF: _____

June 14, 1990

VISTA

Ms. Claudette Cofta
Chemical Manufacturers Association
2501 M. Street
Washington, D.C. 20037

Dear Claudette:

During our Product Safety Task Group meeting last week, Glen asked that we send comments on the most recent draft Product Stewardship Code of Management Practice.

At this time, I have only one comment in the Supply and Distribution Section. The third element states.. "select toller who meets our own health, safety and environmental standards". I don't believe this is realistic or possible in today's business environment. We choose ex-plant operations that are in compliance with applicable regulations and run an environmentally sound business but do not, and I believe cannot, expect them to operate according to our standards.

I suggest the words of this element be modified.

Sincerely,

Tom Grumbles

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

dlj

VVV 000013200

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: June 15, 1990

SUBJ: PROGRESS REPORT

VISTA

Interoffice
Communication

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.

VVV 000013201

R. D. Gamblin Memo
June 15, 1990
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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.

Tow

T. G. Grumbles

dlj

VVV 000013202

TO: Distribution

TGG: JGL ERT: ~~MMH~~ AJO: RF

XF: None

FROM: T. G. Grumbles

DATE: June 20, 1990

Interoffice
Communication

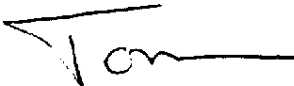
SUBJ: JUNE 29 LAKE CHARLES GROUNDWATER ISSUES MEETING AGENDA

VISTA

PRELIMINARY AGENDA
LCGW ISSUES MEETING
JUNE 29, 10:00-2:00
VISTA HEADQUARTERS, ROOM 2-004

OBJECTIVE: Determine data needs to accurately assess the regulatory and design options for discharge of the "remediation" groundwater.

1. Review agenda and agree on objective
2. Regulatory timing/issues relating to Vista wastewater treatment system TGG
3. Wastewater issues DRB
 - a. Anticipated permit and other effluent limits
 - b. Impact of RCRA classification issue
4. Review of AWD technology selection report GB
5. Data needs GB
 - a. What we have
 - b. Agree on what we need ALL
6. Review Action Items TGG



T. G. Grumbles

dlj
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Distribution: J. Neeld, G. Wojnowski, D. Booth, G. Bacon, W. L. McClain

VVV 000013203