

Vista Chemical Company

15990 North Barker's Landing Road
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

~~# Cust. Rep.~~

January 21, 1988

VISTA

Reynolds Metals Company
ATTN: Industrial Hygiene
6603 West Broad Street
Richmond, VA 23230

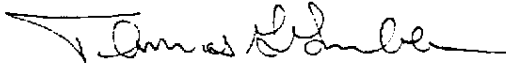
Dear Mr. Cole:

The attached letter was recently received by BP Performance Polymers in Hackettstown and forwarded to us for response. The products listed in your letter are currently produced by Blane Polymers, which is now a division of Vista Chemical Company.

A current MSDS which covers all of the Blane Compound products is enclosed. I believe it satisfies your data needs.

Please call me at 713/531-3445 if you have further questions.

Sincerely,



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

ajo
.302

Enclosure

cc Dave Campanella (w/o att.)

VVV 000010034

CC D.C.

REYNOLDS ALUMINUM
Richmond, Virginia

December 4, 1987

BP Performance Polymers, Inc.
P. O. Box 400
Hackettstown, NJ 07840

Go: Nick
Please
comment
Tony
12/29

Gentlemen:

We have reviewed your Material Safety Data Sheet (MSDS) on

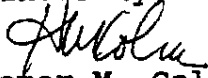
BLANE NO. 8056
BLANE NO. 85-511

Our review of the sheet indicates the form does not appear to be up-to-date nor to cover all the information required by the OSHA Hazard Communication Standard. Attached is a checklist indicating each deficient area.

In summary, the OSHA Hazard Communication Standard requires REYNOLDS to train its employees regarding the hazards associated with their workplace. In order to carry out this requirement, we must rely on Material Safety Data Sheets as the cornerstone to our training efforts. Therefore, please review your MSDS for accuracy and completion and forward any information to me.

Thank you for your prompt attention to this matter.

Sincerely,


Homer M. Cole
Dir., Industrial Hygiene

PLEASE REFERENCE Y138-1204
REPLY TO:

REYNOLDS METALS COMPANY
Attn. Industrial Hygiene
6603 West Broad Street
Richmond, VA 23230

804-281-2000

VVV 000010035



VVV 000010036

Bane NO. 8036
(Product Name)

MATERIAL SAFETY DATA SHEET CHECKLIST

Each item below must be provided on every MSDS.

INFORMATION COMPLETE?

	<u>YES</u>	<u>NO</u>
1. Product or chemical identity	☒	☐
2. Name, address and phone number for hazard and emergency information	☒	☐
3. Chemical and/or common names of hazardous ingredients	☐	☒
4. OSHA permissible exposure level (PEL), ACGIH threshold limit value (TLV), or other applicable limits	☐	☒
5. Physical and chemical characteristics, such as vapor pressure and flash point	☒	☐
6. Physical hazards, including the potential for fire, explosion and reactivity	☒	☐
7. Primary routes of entry into the body, such as inhalation, ingestion, or skin absorption	☐	☒
8. Health hazards, including signs and symptoms of exposure	☒	☐
9. Medical conditions aggravated by exposure	☐	☒
10. Carcinogenic hazard - National Toxicology Program (NTP) Annual Report on Carcinogens, International Agency for Research on Cancer (IARC) Monographs, or regulated by OSHA	<u>N/A</u>	☐
11. Emergency and first aid procedures	☒	☐
12. Precautions for safe handling and use including hygienic practices, repair and maintenance protective measures, or spill/leak clean-up	☒	☐
13. Exposure control measures such as engineering controls, work practices, and personal protective equipment	☒	☐

J. B.

VVV 000010037

Elcno 8E-511
(Product Name)

MATERIAL SAFETY DATA SHEET CHECKLIST

Each item below must be provided on every MSDS.

INFORMATION COMPLETE?

YES

NO

- | | | |
|---|------------|----------|
| 1. Product or chemical identity | <u>✓</u> | <u>—</u> |
| 2. Name, address and phone number for hazard and emergency information | <u>✓</u> | <u>—</u> |
| 3. Chemical and/or common names of hazardous ingredients | <u>—</u> | <u>✓</u> |
| 4. OSHA permissible exposure level (PEL), ACGIH threshold limit value (TLV), or other applicable limits | <u>—</u> | <u>✓</u> |
| 5. Physical and chemical characteristics, such as vapor pressure and flash point | <u>✓</u> | <u>—</u> |
| 6. Physical hazards, including the potential for fire, explosion and reactivity | <u>✓</u> | <u>—</u> |
| 7. Primary routes of entry into the body, such as inhalation, ingestion, or skin absorption | <u>—</u> | <u>✓</u> |
| 8. Health hazards, including signs and symptoms of exposure | <u>✓</u> | <u>—</u> |
| 9. Medical conditions aggravated by exposure | <u>—</u> | <u>✓</u> |
| 10. Carcinogenic hazard - National Toxicology Program (NTP) Annual Report on Carcinogens, International Agency for Research on Cancer (IARC) Monographs, or regulated by OSHA | <u>N/A</u> | <u>—</u> |
| 11. Emergency and first aid procedures | <u>✓</u> | <u>—</u> |
| 12. Precautions for safe handling and use including hygienic practices, repair and maintenance protective measures, or spill/leak clean-up | <u>✓</u> | <u>—</u> |
| 13. Exposure control measures such as engineering controls, work practices, and personal protective equipment | <u>✓</u> | <u>—</u> |

J.G.M.
✓

VVV 000010038

TO: Distribution

FROM: T. G. Grumbles
DATE: January 21, 1988

Interoffice
Communication

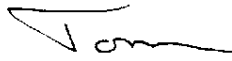
SUBJ: CLER STEERING COMMITTEE FOLLOW-UP TSCA 8(E) REPORTING

VISTA

At the last Steering Committee meeting, Tom King expressed concern over what he thought to be a recent change in EPA's position on 8(e) reportability. He asked that I follow-up with Jim Mieure to determine what "the deal was".

I spoke with Jim and he reviewed with me recent discussions and statements made by Dave Williams of the Agency's 8(e) office. Mr. Williams is expressing a policy direction that seems clearly outside the scope of the regulatory language that defines the reporting criteria for 8(e) notices. A summary from a CMA meeting with Mr. Williams is attached. This is an internal Monsanto memo and Jim requested we keep it "inside Vista".

Monsanto's lawyers have been reviewing this issue. To date they have advised that no change is necessary in Monsanto's reporting "triggers". By copy of this memo, I will begin reviewing this issue with Bill McClain. For now I don't believe anything should change for Vista or CLER.


T. G. Grumbles

ajo
.304

Attachment

cc WLM

DIST: O. C. Kerfoot
C. M. Starks
A. M. Nielsen
J. C. Ledvina

VVV 000010039

P.S. The attached flow chart clearly defines the 8(e) process!

BY: C. Elmer SECTION: S&EH
TRIP DATE: 12/1/87 SHEET: 1 OF 2

Location Visited

Washington, DC

Purpose

CMA - Notification and Reporting Task Group Meeting - 12/1/87

Report Summary & Conclusions

Two issues took up this seven-hour meeting, attended by almost thirty people, including twenty member companies.

1. TSCA 8(e)

Dave Williams, Section 8(e) coordinator, attended the meeting at our request, and spent the morning describing the principles used to determine 8(e) notification. Much of this had been reported earlier by Ron Condray as a result of meetings with Williams but not properly appreciated by the group until they heard it from the "horse's mouth".

A distillation of the salient points provided by this zealot, who considers himself the protector of the innocent from the horrors of chemicals, from womb to tomb, might be of interest:

Any unpublished information which shows or implies a systemic effect should be considered as an 8(e) submission. Of particular importance are effects implying cancer (benign tumors, multiple in vitro positives); reproductive effects, regardless of maternal toxicity; neurological effects, as might be found during an LD₅₀ study. These effects must be reported regardless of assessment of substantial risk, i.e. dosage or route of administration in relation to the realities of potential human exposure are not considered until 8(e) submissions are used at a later date for risk assessment.

Furthermore, the agency welcomes - but doesn't mandate - any test results as FYI submissions. If, however, an FYI submission is determined to be an 8(e) and was submitted in a timely fashion, i.e. 15 days, it will be classified as such and placed in the 8(e) file. The submitter receives a "Memo of non-compliance", without penalty. Any subsequent submissions, however, which are turned in as FYI but judged to be 8(e), will be treated as a penalty enforceable non-compliance. If the FYI was not a timely submission, the Office of Compliance Monitoring will be contacted for follow-up.

Some of the examples were real eye-openers: Information seen at a poster session concerning one of your chemicals - reportable, even though you only provide a summary of what you heard. The same goes for discussions with others at technical meetings. (How enforceable?) In answer to the questions: What about increased liver weight found during an LD₅₀ study? Williams would not commit himself but left the implication that it should be submitted and left to his judgement.

So far, there have been about 700 8(e) submissions and about 550 FYIs. Williams' analysis of 8(e)s, so far, are available in report volumes. The N&R Task Group will request an analysis of these judgements so that they can be related to chemical as well as effects found. (We intend to put this into a database for easy internal searching.) It is likely that Bob Sussman will get this contract since he has already submitted a quote and is familiar with the issues. This data will be assessed by the Task Group and a determination made if there is a basis for a high level (J.Moore) review of EPA's policy and interpretation.

Attached is a hand-out by Williams, showing the 8(e) review process.

2. TSCA 8(d)

The latest draft of a CMA position paper, prepared in anticipation of discussions with EPA, was reviewed. The result of another work-group meeting in which Pete Smith and I participated, this draft reflected a change in format and emphasis much closer to Monsanto's point of view.

Considerable discussion during this meeting resulted in a) removal of sections implying EPA's lack of use of previous 8(d) submissions, b) industry's potential reduction of monitoring if the rule changes required more submissions, and c) addition of descriptions and references to the appended examples showing "submittable under recommended definitions" and "non-submittable" studies which were culled from the current 8(d) files.

The paper will be revised and targeted for approval by H&S Committee mid-December, then presented to EPA for digesting prior to a meeting with them.

3. TSCA Section 5 (PMN)

A meeting is set for December 7 to review CMA/EPA ideas on improving the Section 5 process, especially Section 5(e). Jeff Felder will represent Monsanto/CMA at the meeting, together with several other industry members. (Attached also is the most recent draft of EPA's Section 5 proposed enforcement response policy.)

Report Distribution

TSCA Committee

cc: T. F. Evans
G. Roush, Jr.

PREPARED BY: C. Elmer

DATE: December 3, 1987

VVV 000010041



An Overview

Section 8(e) of the Toxic Substances Control Act

Section 8(e) of the Toxic Substances Control Act (TSCA) states that "any person who manufactures, [imports,] processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment shall immediately inform the [EPA] Administrator of such information unless such person has actual knowledge that the Administrator has been adequately informed of such information."

Section 8(e) became effective on January 1, 1977, the effective date of TSCA.

A Section 8(e) policy statement ("Statement of Interpretation and Enforcement Policy: Notification of Substantial Risk"), which clarified the types of information to be submitted and the procedures for doing so, was published in the Federal Register on March 16, 1978 (43 FR 11110).

Since January 1, 1977, a large number of Section 8(e) notices covering a wide range of chemical toxicity/exposure information have been received and given priority evaluation and appropriate followup attention by the Office of Toxic Substances (OTS).

Upon receipt of a Section 8(e) submission, OTS prepares a status report which contains a description and preliminary assessment of the submitted information, a statement regarding production and use(s) of the subject chemical(s), and recommendations for appropriate OTS followup actions/activities.

EPA's implementation of Section 8(e) has brought about heightened corporate awareness of potential chemical risks, leading to voluntary company actions designed to protect human health and the environment.

Many companies have reported that in direct response to submitted chemical toxicity/exposure information, the following types of health and environmental protection measures were initiated:

- Notification of workers, customers, and others
- Labelling and Material Safety Data Sheet (MSDS) changes made
- Manufacturing, processing, and/or handling changes made
- Chemical production or use halted temporarily or discontinued altogether
- Additional toxicity/exposure studies performed.

The chemical industry's increased awareness of potential risks posed by chemicals to health and the environment is evidenced further by many voluntary industry submissions received by OTS on a "For Your Information" (FYI) basis.

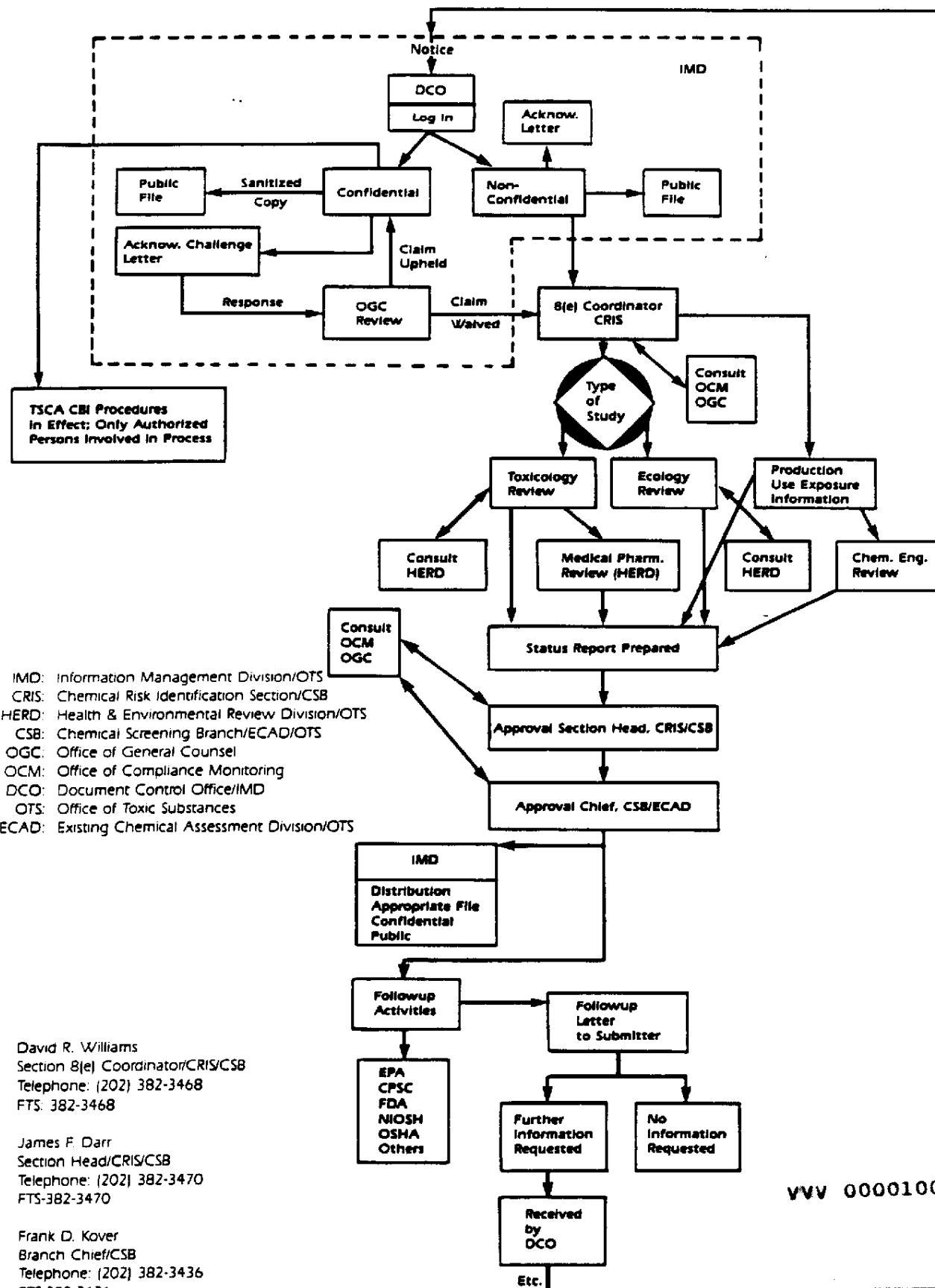
High-level scientific and administrative contacts have been established by OTS in each of EPA's Program Offices and in other Federal agencies (e.g., NIOSH, OSHA, CPSC, FDA, NTP) in order to provide a mechanism for timely and prioritized dissemination of information concerning newly discovered hazards/risks associated with exposure to chemical substances or mixtures.

For further information regarding TSCA Section 8(e), please call:

David R. Williams (TS-778)
TSCA Section 8(e) Coordinator
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
Telephone: (202) 382-3468

VVV 000010042

Processing of 8(e) Notices of Substantial Risk



VVV 000010043

TSC: ~~ML~~: ~~MMG~~: ~~GP~~
XF: PVC

January 20, 1988

VISTAReynolds Metals Company
Attn: Industrial Hygiene
6603 West Broad Street
Richmond, VA 23230

RE: E052-1130

Dear Mr. Cole:

This letter is in response to the attached inquiry regarding the MSDS for Vista PVC Compound. Enclosed is the current MSDS for PVC Compound.

Regarding your question on the hazards of the listed ingredients, Vista's experience indicates that handling of PVC Compound under anticipated use conditions does not create exposures to these additives. These additives are encapsulated in the PVC matrix. We are currently modifying our PVC Compound MSDS to more clearly reflect this.

Regarding your deficiency notice, I believe the MSDS to satisfy all the indicated areas. The health hazards of PVC are indicated in Section 5 of the MSDS. There are no known specific medical conditions that would be aggravated by exposure to PVC dust, and PVC is not a carcinogen as defined in the Hazard Communication Standard.

Please call me at 713/531-3445 if you have further questions on the above.

Sincerely,

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

ajo

Enclosures

cc: Keith Fogg

VVV 000010044

REYNOLDS ALUMINUM
Richmond, Virginia

December 7, 1987

VISTA POLYMERS, INC.
P.O. BOX 91
ABERDEEN, MS 39730

Gentlemen:

We have reviewed your Material Safety Data Sheet (MSDS) on POLYVINYL CHLORIDE.

Our review of the sheet indicates the form does not appear to be up-to-date nor to cover all the information required by the OSHA Hazard Communication Standard. Attached is a checklist indicating each deficient area.

In addition, no mention is made of the chronic hazards associated with the ingredients on the attached list.

Was this omission an oversight, or did your hazard determination indicate that such effects would not be expected in the use of your product?

In summary, the OSHA Hazard Communication Standard requires REYNOLDS to train its employees regarding the hazards associated with their workplace. In order to carry out this requirement, we must rely on Material Safety Data Sheets as the cornerstone to our training efforts. Therefore, please review your MSDS for accuracy and completion and forward any information to me.

Thank you for your prompt attention to this matter.

Sincerely,


Homer M. Cole
Dir., Industrial Hygiene

PLEASE REFERENCE E052-1130
REPLY TO:

REYNOLDS METALS COMPANY
Attn. Industrial Hygiene
6603 West Broad Street
Richmond, VA 23230

VVV 000010045



REYNOLDS ALUMINUM
Richmond, Virginia

INGREDIENTS

CHRONIC HAZARD(S)

CADMIUM

CARCINOGEN, TERATOGEN,
MUTAGEN, REPRODUCTIVE TOXIN,
LUNGS, KIDNEY, BLOOD, CENTRAL
NERVOUS SYSTEM

LEAD

REPRODUCTIVE TOXIN, KIDNEY,
CENTRAL NERVOUS SYSTEM

BARIUM

SKIN, LUNG, EYE

ANTIMONY

CARCINOGEN, LUNGS, SKIN, EYE

associated with the ingredients in the product listed

REYNOLDS ALUMINUM COMPANY

VVV 000010046



Polyvinyl Chloride
(Product Name)
PVC Compound

MATERIAL SAFETY DATA SHEET CHECKLIST

Each item below must be provided on every MSDS.

INFORMATION COMPLETE?

	<u>YES</u>	<u>NO</u>
1. Product or chemical identity	<u>X</u>	—
2. Name, address and phone number for hazard and emergency information	<u>X</u>	—
3. Chemical and/or common names of hazardous ingredients	<u>X</u>	—
4. OSHA permissible exposure level (PEL), ACGIH threshold limit value (TLV), or other applicable limits	<u>X</u>	—
5. Physical and chemical characteristics, such as vapor pressure and flash point	<u>X</u>	—
6. Physical hazards, including the potential for fire, explosion and reactivity	<u>X</u>	—
7. Primary routes of entry into the body, such as inhalation, ingestion, or skin absorption	<u>X</u>	—
8. Health hazards, including signs and symptoms of exposure	—	<u>X</u>
9. Medical conditions aggravated by exposure	—	<u>X</u>
10. Carcinogenic hazard - National Toxicology Program (NTP) Annual Report on Carcinogens, International Agency for Research on Cancer (IARC) Monographs, or regulated by OSHA	—	<u>X</u>
11. Emergency and first aid procedures	<u>X</u>	—
12. Precautions for safe handling and use including hygienic practices, repair and maintenance protective measures, or spill/leak clean-up	<u>X</u>	—
13. Exposure control measures such as engineering controls, work practices, and personal protective equipment	<u>X</u>	—

WSP

VVV 000010047