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TGG: JCL: ERT: MIA: **VISTA**
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Claudette Cofta
Chemical Manufacturers Association
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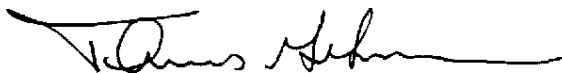
Dear Claudette:

This memo is to comment on the existing Chemical Control Task Group Environmental Hazard Communication working paper. I believe we are trying to move too far, way too fast. To draft a format or scope document of a regulation without a firm idea of what the hazard assessment process leading to communication would be, seems totally backwards. I believe we should focus our initial efforts on the singular issue of the criteria to be used for defining an environmental hazard. Without some idea of this criteria, it is impossible in my mind to scope a framework for the rest of the regulatory framework.

This step will be difficult for environmental hazards. It is difficult enough for physical and health hazards. It took a very long time for OSHA to reach a workable solution for hazard communication, and it's scary to think EPA wants to tackle a more complex subject in the next 6 months.

I think we could make some good recommendations on a test panel, or minimum data set that would trigger environmental hazard communication requirements. Until we get this issue "scoped", it's a mistake to proceed with a full concept document.

Sincerely,



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

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