

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224
Fax (713) 588-3236

February 8, 1990

TGG: JCL: ERT: MJH: AJO: RF

XF: _____

VISTA

Mr. M. Lummis
Room 3.1.16
Department of Energy
1 Palace Street
London SW1E, 5HE

Dear Mr. Lummis:

I am writing in regards to a memo I sent to you on 12/13/89 (attached) regarding the status of Vista ODC Drilling Fluids for use in offshore drilling operations.

I have not received a response and wanted to again request information on the status of Vista's fluids.

Sincerely,



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

dlj

Attached

VVV 000011050

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: February 9, 1990

Interoffice
Communication

SUBJ: PROGRESS REPORT

VISTA

1. The final Aberdeen environmental audit report was submitted.
2. Assisted S&T Group on two Vendor Quality Audits - Howell and Pak Tank Corp.
3. The first draft on four environmental engineering guidelines was sent out for review.
4. A meeting was held with the Industrial Chemicals Business Area to review final proposed toxicity testing protocols for alumina. The testing will be done to evaluate various employee health allegations and assure a complete hazard determination for this product.
5. TGG attended a CMA Responsible CARE Coordinators Meeting. The meeting was attended by 120 CMA companies and dealt with implementation of Responsible CARE. Highlights included CMA's new national publicity campaign on the program to begin in April, and discussions on company experiences in communicating the program internally.
6. TSCA certification was provided for all components in Premiere Polymers PVC compounds.
7. Revised the letter to Vista 47 Ink Solvent customers regarding the nonapplicability of California Proposition 65.
8. Trade secret claims for PVC dryblend and compound microingredients are being worked on in preparation for the New Jersey Right-to-Know Act.
9. MJH met with members of S&T to discuss Vista's response to HM-126C.
10. Preliminary discussions were held with a consultant regarding the development of French WHMIS MSDS's and labels, a Canadian requirement.
11. MJH met with Clean Houston and a recycler to discuss the logistics of a corporate recycling program.
12. 38 COEDS ordered MSDS's were mailed out. New MSDS were completed for NOVEL II 1416 HA-70 Ethoxylate and N500L/LPA-140 Blend.


T. G. Grumbles

VVV 000011051

dlj

Interoffice
Communication

TO: Distribution

FROM: T. G. Grumbles
DATE: February 9, 1990

SUBJ: CLEAN WATER ACT ENVIRONMENTAL SEMINAR AGENDA

~~TOG: JCL: CRT: MHH: AJO: RF~~
Dask

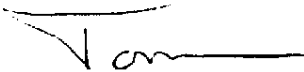
VISTA

DATE: February 21, 1990
TIME: 1:00 - 3:00
PLACE: Board Room

OBJECTIVE: To provide a general overview of the
Clean Water Act and regulations.

To discuss the impact on Vista plants

1. Perspective: How does the CWA fit with other laws
and regulations? 10 min
2. Background 10 min
 - a. History
 - b. Acronyms
 - c. NPDES Permits
3. Basics of Biological Treatment 10 min
4. NPDES and State Permits 20 min
5. Vista's Situation - Now and Future 20 min
6. Summary 10 min


T. G. Grumbles

dlj
.1005

Distribution: V. Weiss, J. Roheim - Austin

R. J. Andersen, J. D. Burns, J. R. Ball, J. A.
DeBernardi, G. G. Draper, R. T. Ferrell, H. R.
Flammer, N. C. Frost, T. H. Huffman, B. E. A.
Larsen, M. J. Schneider, W. J. B. Vogel, J. J.
Weidner, D. L. Cohen, W. L. McClain

cc: J. C. Ledvina

VVV 000011052

**Interoffice
Communication**

TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: February 15, 1990

SUBJ: PROGRESS REPORT

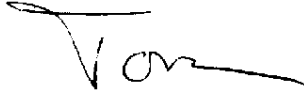
VISTA

1. Environmental and Legal gave a Product Liability Training Session for Engineering. Another session is scheduled for 2/21.
2. Discussions were held with International on revising export addresses in COEDS to insure that export customers receive MSDS's.
3. MJH began discussions with U. S. Coast Guard regarding a MARPOL classification for ALFONIC 1214 GC-30.
4. JCL and TGG participated in a CLER Steering Committee meeting with Monsanto in Austin. Plans were made to visit approximately 10 U. S. users of LAB/LAS to re-emphasize how environmentally friendly the product is.
5. OKC has been asked by EPA to submit a RCRA post-closure permit application or make an equivalent showing for the South Impoundment at the plant. This impoundment was a RCRA facility. It was taken out of RCRA service in 1985 in accordance with the closure standards in effect at that time. However, in late 1987 EPA changed the rules making closure demonstrations subject to much stricter standards. On January 22, 1990 EPA sent a letter to the plant stating that the new closure standards apply to the OKC impoundment. JCL and Legal met with plant people on 2/14. The plant will prepare an equivalency package for internal review to see if we have sufficient information to avoid the post-closure permit.
6. JCL and Legal met with Conoco to discuss the implications of a report prepared for EPA by a contractor concerning past Aberdeen waste disposal practices. The contractor recommends that EPA do a more detailed study at Aberdeen to determine if a clean-up is necessary. A plant representative met with EPA-Atlanta to get more details. EPA said they would be evaluating the report. Vista and Conoco people will meet at the Plant on 2/27 to develop a strategy.
7. 27 COEDS ordered MSDS sent out.
8. ERT attended Third-Third Land Ban Seminar given by Chemical Waste Management in Houston. This list will essentially eliminate land disposal of most hazardous waste Vista currently generates.

VVV 000011053

R. D. Gamblin
February 15, 1990
Page 2

9. A meeting of the Environmental Engineering Guidelines Team was held. The four guidelines were reviewed and will be revised.

A handwritten signature in black ink, appearing to read 'T. G. Grumbles', with a long horizontal flourish extending to the right.

T. G. Grumbles

dlj

VVV 000011054