

TO: Distribution

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XF: Desk

FROM: T. G. Grumbles
DATE: January 8, 1991

Interoffice
Communication

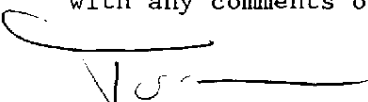
SUBJ: RESPONSIBLE CARE DISTRIBUTION CODE OF MANAGEMENT PRACTICE -
SELF ASSESSMENT

VISTA

The subject code was approved in November and we are expecting the first self-assessment in late January. This will be the fourth code to reach this stage, and probably the most difficult from a functional standpoint to complete. The code has elements that involve multiple functional areas from Manufacturing, S&T, Environmental and possibly others.

To facilitate the first self-assessment, Mike Horowitz and I have reviewed the code and developed the attached list of apparent ownership for the elements covered by the code. Ownership meaning, control over the activity and/or ability to assess our level of implementation versus the code, as well as ability to achieve improvement in the specific code areas.

At this time, we are asking you to review the attached code guidance for completion provided by CMA, and our thoughts on ownership. When the official request for self-assessment is received, we'll be back in touch to complete the self-assessment. Please call me or Mike with any comments or concerns you may have at this time.


T. G. Grumbles

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TRANSPORTATION CONTACTS

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Distribution Code of Management Practices
Proposed Ownership of Code Elements

Risk Management Practices

- 1.1 Regular evaluations of chemical distribution risks which consider the hazards of the material, the likelihood of accident/incidents, and the potential for human and environmental exposure from release of the material over the route of transport.

1. New activity - Unknown

- 1.2 Implementation of chemical distribution risk reduction measures that are appropriate to the risk level.

1. New activity - Unknown

- 1.3 Internal reporting and investigation of chemical distribution accidents/incidents, and implementation of preventive measures.

S&T, CTIRP

1. Determine reporting and investigation procedures for all modes of shipment.
2. Are there preventative measures?

Compliance Review and Training

- 2.1 A process for monitoring and interpreting new and modified regulations and industry standards for their applicability to the company's chemical distribution activities, and for implementing those regulations and standards.

Environmental

1. Monitor and interpret new regulations. Collect and distribute information on applicable industry standards.
 2. Monitor compliance activities via phone, project teams and audits.
- 2.2 Training for all affected company employees in the proper implementation of applicable regulations and company requirements.

Environmental

1. Develop training modules for general and specific applications.
2. Perform initial training sessions at plant and headquarters locations.
3. Video tape modules when practical for future viewing.

Plants

1. Determine training needs for personnel.
 2. Ensure new employees receive adequate training for their areas of responsibility.
- 2.3 A program for providing guidance and information to carriers, distributors and contractors who perform distribution activities for the company on the company's training and compliance requirements for the activities.

Environmental

1. Develop information, with guidance from plants and S&T, on training and compliance requirements.
2. Be available as an information resource for carriers, distributors, and contractors regarding regulatory requirements.

S&T

1. Determine list of carriers and other parties who perform distribution activities for communication mailings.

Plants, S&T

1. Determine type of information needed by carriers, etc.
- 2.4 Regular reviews of company employee, carrier, distributor and contractor compliance with applicable regulations and company requirements.

Environmental

1. Determine employee compliance via audits at Vista sites.
2. Provide assistance to S&T, as needed, for carrier and distributor audits.

S&T

1. Determine carrier, distributor compliance via audits, questionnaires, etc.

Carrier Safety

- 3.1 A process for qualifying carriers of all modes and types (common, contract, private and customer controlled) that transport chemicals to and from company facilities that emphasizes carrier safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.

S&T

1. Qualify all rail and motor carriers as noted above.

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2. Work with customers to qualify customer designated carriers and customer pick-ups.

3. Work with CMA carrier audit committee to minimize expense of audits.

S&T, International Operations

1. Qualify all marine carriers as noted above.

3.2 Feedback to carriers on their safety performance and suggestions for improvement.

S&T, International Operations

1. Provide feedback to carriers on safety performance and suggestions for improvement.

Handling and Storage

4.1 Documented procedures for the selection and use of containers that are appropriate for the chemical being shipped, in compliance with testing and certification requirements, and free of leaks and visible defects.

S&T

1. Work with plants, R&D, and environmental to determine proper containers (including bulk) for chemicals and document procedures.

Plants

1. Check all containers (including bulk) for leaks and visible defects before shipments. Document procedures.

2. Offer, with R&D, chemical compatibility information for choice of proper containers.

Environmental

1. Provide advice on regulatory issues affecting choice of containers.

4.2 Documented procedures for loading chemicals at company facilities that will reduce emissions to the environment, protect personnel, and provide securement of the lading during transit.

Plants

1. Develop written loading procedures for each mode which are designed to reduce emissions to the environment, protect personnel, and provide securement of the lading during transit.

4.3 Documented procedures for unloading chemicals at company facilities that will reduce emissions to the environment, protect personnel, and provide the safe unloading into proper storage facilities.

Plants

1. Develop written unloading procedures for each mode which are designed to reduce emissions to the environment, protect personnel, and provide the safe unloading into proper storage facilities.
- 4.4 Defined criteria for the cleaning and return of tank cars, tank trucks, marine vessels, and returnable/refillable bulk and semi-bulk containers, and for the proper disposal of cleaning residues.

S&T, Plants

1. Define criteria for cleaning and return of tank cars, tank trucks, and returnable/refillable bulk containers.

S&T, International Operations

1. Define criteria for cleaning of marine vessels.

Environmental

1. Assist all parties in determining proper disposal procedures for cleaning residues.
- 4.5 A program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing the company's chemicals.

S&T

1. Develop program to provide guidance and information to ex-plant facilities which handle Vista product regarding unloading and storing of material.

Environmental, R&D

1. Develop program to have current factual information in MSDSs regarding unloading and storing of chemicals.
- 4.6 A process for selecting distributors and other facilities that store or handle the company's chemicals in transit that emphasizes safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.

S&T

1. Develop process discussed above for all ex-plant facilities.
- 4.7 Feedback to distributors and operators of other facilities that store or handle chemicals in transit on their safety performance and suggestions for improvement.

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S&T

1. Develop feedback process discussed above for all ex-plant facilities.

Emergency Procedures

- 5.1 A process for responding to chemical distribution accidents/incidents involving the company's chemicals.

Covered by Vista's CTIRP.

- 5.2 Documented procedures for making information about the company's chemicals in distribution available to response agencies.

Plants

1. Develop procedures for making information available to pertinent federal and industry groups (i.e. CHEMTREC) and state and local groups (i.e. LEPC's, fire departments).
- 5.3 A program for making facilities and/or training materials available to emergency response agencies.

Plants

1. Develop program discussed above.
- 5.4 Dialogue with state and local emergency planning organizations on the distribution and hazards of the company's chemicals to improve community preparedness to respond to chemical distribution emergencies.

Plants

1. Develop program discussed above.

S&T, Environmental

1. Assist plants with information on distribution and hazards of chemicals.
- 5.5 Dialogue with the public on their concerns about chemical distribution safety, actions taken by the industry and the company to improve the safety of chemical distribution, and the effectiveness of emergency preparedness and emergency response assistance.

Plants

1. Develop public awareness program.

Public Relations

1. Assist plants in developing community relations program.