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TGG: JCL: MMG: AJO: RF
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August 17, 1989

VISTA

Mr. Dave Capella
Michelman, Inc.
9089 Shell Rd.
Cincinnati, Ohio 45236

Dear Dave:

As you requested, this letter is to certify that Vista Dispal Sol contains no detectable levels of fibrous alumina.

If you have further questions regarding the safety and health aspects of this product, please contact me at 713-588-3445.

Sincerely,



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

dlj

cc: Rick Tuttle

VVV 000009544

TO: Distribution

FROM: T. G. Grumbles
DATE: August 17, 1989

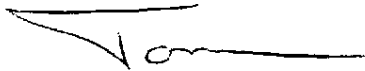
Interoffice
Communication

TO: JOE. MMG: AJO. RE
JOE. MMG. ASO. RF
XP: ADRE

VISTA

Attached are two articles regarding the pressures and needs to reduce all emissions and specifically waste generation.

The Forney article further emphasizes the need for performance improvement by the industry and how Responsible CARE can provide a mechanism for that.



T. G. Grumbles

dlj
.728

cc: PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. B. Maher-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, R. A. Conrad-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem

T. H. Huffman, J. A. DeBernardi, R. D. Gamblin, R. Ferrell, J. Ball, J. Burns, G. Draper

VVV 000009545

We must reduce releases—Forney

Speaking at CMA's recent annual meeting, outgoing board chairman Bob Forney shared thoughts on where he sees the Association going and what the industry has to do to get there. Here are highlights:

Without question, one of the most significant developments in the Association during the past several years has been the commitment that we've made to Responsible Care. CMA has done a very successful job of developing the program elements and tailoring them to fit the needs of the U.S. chemical industry in the current public policy environment. We are aware, however, that at this point words mean little for our industry, and they can accomplish even less for it.

The only thing that people are going to believe is performance. In the absence of performance, the slogans and the programs are only invitations for skeptics to label us as hypocrites. If we say one thing and do the opposite, we'll increase public cynicism rather than increasing public confidence.

The challenge for member companies is to take this Responsible Care program and make it do the job for which it is intended. And that is to improve industry performance, and thereby the public perception that the chemical industry is ethical, safe and environmentally sound.

Responsible Care provides us with the foundation. But to be successful, we're going to need genuine commitment on the part of all executive contacts, Responsible Care coordinators and your whole organization.

If Responsible Care does not succeed in improving performance and public perception of our industry, it's not going to be easy to come up with something else that does.

The next most important program activity of the Association is our effort to increase our effectiveness at the state level of government. During the 1980s, CMA and the industry gained effectiveness among government officials and elected leaders in Washington.

We've still got a long way to go before we have similar recognition and credibility in the states. We're making progress but, as I am sure you appreciate,



ate, the challenge is very considerable.

We can see that the shift in regulatory formulation from the federal to the state governments is in many respects just beginning, and it may very well accelerate in the next decade. State superfunds, right-to-know laws, Proposition 65, other toxics control initiatives—these are all indicators that the state governments are going to be just as important in our future as the federal government.

CMA has always tracked developments in the states but has never had major advocacy programs in place, and

our links to the state industry councils have, frankly, been on the weak side. And even now, you've got to say that the state of chemical industry organization and advocacy in several very key states is best described as ragtag.

This is going to have to change, and we're going to have to do it. The change is going to require great cooperation, considerable financial support, and a lot of sweat equity as we strive to build up these state CICs and get the most of what CMA has to offer in terms of support for industry concerns at the state level.

I believe the single most important issue that we have to deal with is the impact of releases to the environment, and I mean this in the broadest sense of all releases, whether sudden or routine, to all media—air, land or water.

The public is telling us that we're going to be responsible for everything that leaves our plants, be it an air emission, a release to a river or a stream, solid waste or product that somewhere down the line from us ends up where it should not be in the environment. Just as six years ago rusted drums were the primary symbol of everything that Americans think is wrong with our industry, today, our SARA 313 reports are destined to become an annual agony for us and a yearly exasperation for the public.

At the top of the current list of public concern with releases is clean air. We successfully resisted the passage of a very poorly crafted toxic section of a clean air bill in the last Congress. But now this issue is back and some of the current proposals are at least a little bit better.

We have successfully positioned CMA as a leader among industrial institutions in this arena. But to hold on to that leadership role and the attention that it commands, we're only going to do this if we continue to maintain our expertise, our credibility with legislators and with their staffers, and only if our performance in reducing releases backs up what we say.

In terms of releases to land, we're confronted with the increasingly difficult problem of solid waste. I don't mean just hazardous waste, although

certainly that's one aspect of the problem where emotions run high and public debate is most intense. But rather, I mean waste as a symptom of how industrialized societies are being perceived by some people as running up against the limits of growth.

We in the chemical industry are right in the middle of the public's perceptions of these waste problems, whether it's hazardous waste, plastic waste, abandoned waste sites—these are all pressure points that can be used as an excuse to moderate chemical industry expansion, or even shut down chemical industry operations. In response, we obviously have to dedicate our resources to properly

"The companies that get out in front on environmental issues are going to be the winners down the road."

treating, handling and disposing of all wastes and, where feasible, recycling it.

We also have to acknowledge that, long term, the public is going to insist that we minimize or eliminate the generation of waste at the source. By the end of the next decade, waste minimization, or the lack of it, will be one of the most pressing policy challenges that will be faced by the members of this Association.

In the area of water releases, our industry supported the modifications to the Clean Water Act that were enacted in the last Congress. The threat to the rivers and streams of our nation is increasingly from municipalities and agricultural runoff, rather than from our point sources. But we're going to have to go beyond the requirements of the Clean Water Act and reduce our releases further.

Groundwater is going to be an area of increasing concern. At the beginning of this decade, slightly more than a quarter of Americans thought that groundwater pollution was a serious problem. Last year, more than half did.

In 1981, only seven percent of Americans believed that most underground sources of water were polluted. Last year, 22 percent believed that. There's a real call for action for us in those numbers.

The message to our industry is very clear. We need to reduce releases, emissions and waste products that end up in the air, land or water. And through our Association's release reduction program and policy, we've agreed to work to reduce these releases into the environment.

The companies that get out front on environmental issues are going to be the winners down the road. Those who compete best in meeting the environmental demands of society are going to have a leg up on their competitors.

At the same time, unacceptable prac-

tices on the part of any one company will tarnish the reputation of every other company. That's why our whole industry has got to be seen as committed to improved performance.

I know that many of you and many of your plants have made real progress in reducing releases in recent years. But good as our progress has been, we're going to have to do a lot more.

I also know that there is really no credible evidence of harm caused by the materials released into the environment at the levels that we release them. But evidence of harm or lack thereof is really not the point at this stage. The mere fact that we are releasing materials of this sort into the environment in the amounts now reported is basically going to be unacceptable to the public. □

Companies win awards

Dow Corning Corp., Midland, Mich., and Weyerhaeuser Company, Chemical Business, Tacoma, Wash., are being honored by CMA for their outstanding safety records.

The safety awards are presented to:

- companies working more than 20 million exposure hours annually;
- companies working two to 20 million exposure hours annually; and
- companies working less than two million exposure hours annually.

There was no winner in the "large" company category this year.

Lawrence A. Reed, president of Dow

Corning Corp., accepted the award as mid-size company winner. Donald Work, Longview, Wash., chemical plant manager, accepted the award for Weyerhaeuser Company's chemical division in the small company category.

Certificate awards were also announced for second place winners in the mid-size and small company categories. The companies are:

- Mid-size company—Quantum Chemical Corp., New York, N.Y.;
- Small Company—Carus Chemical Company, Division of Carus Corp., LaSalle, Ill. □



Donald Work (l) receives DuPont safety award from Mr. Forney.

VVV 000009547

Waste reduction is good business—CMA

"Waste reduction is good business," a CMA spokesman told the House Subcommittee on Transportation and Hazardous Materials.

"It reduces releases to the environment, resource use, manufacturing and waste management cost and liability and also responds to the growing public concern most recently spurred by SARA Title III," continued Morton Mullins, director of regulatory affairs for Monsanto Company.

Mullins, who is also chairman of CMA's Resource Conservation and Recovery Act legislative work group, shared an example of Monsanto waste-reduction activities that is indicative of industrywide practices.

"By identifying improved gasket materials and maintenance procedures, modifying process equipment and treating the remaining emissions," a plant at Cincinnati achieved a 75 percent waste reduction, saving nearly \$200,000 per year in raw materials and waste management costs.

"While chemical manufacturers have pursued these types of waste and release reduction efforts individually for years," Mullins said, "CMA has recently instituted a voluntary, industrywide program to further stimulate release reduction. This initiative builds upon CMA's existing waste minimization program and air quality policy by extending waste reduction to all environmental media.

"Using SARA Section 313 release inventories at each plant as a starting point, member companies will develop reduction priorities based, among other things, on potential health and environmental impact and community exposure, and then formulate a release reduction plan," he said.

"Progress and future plans will be communicated on a regular basis to the plant's employees and to the public."

Mullins offered the following comments on the pending federal legislative proposal, HR 1457:

■ CMA supports "the use of qualita-

tive goals and reliance on voluntary programs."

■ The association supports "the grants, technical assistance and information clearinghouse as means to facilitate voluntary reduction."

■ CMA supports the need to establish a comprehensive national database that quantifies and can track trends in generation and management of waste. However, "the bill as drafted stops short of this goal by not recognizing treatment."

■ CMA opposes the requirement to project future results.

Mullins said the Association will continue to work with staff "to improve protection of confidential business information and to clarify that closed-loop recycling is intended as a form of source reduction."

Mullins added that "the bill contains many of the components CMA believes necessary to workable waste reduction legislation." □

Calendar

Government Relations Briefing Breakfast, July 27, Sheraton Carlton Hotel, Washington, D.C. Contact: Robert Hill (202) 887-1128.

Communicating Risk: The CMA Workshop, September 19-20, Newark, N.J.; October 11-12, Chicago, Ill.; and November 15-16, New Orleans, La. Contact: John Slavick (202) 887-1210.

CHEMTREC Emergency Response Team Workshop, September 25, Holiday Inn, Pueblo, Colo. Contact: Alma Howard (202) 887-1263.

International Chlorine Dioxide Symposium, November 1-2, Stouffer Concourse Hotel, Denver, Colo. Contact: Bert Romano (202) 887-1198.

CMA Chemical Industry Conference, November 6-7, Washington Hilton, Washington, D.C. Contact: Edith Fleming (202) 887-1114. □

