F27.1

TO: John Friend

FROM: M. M. Goodreau
DATE: January 19, 1987

Interoffice Communication

SUBJ: DOT HAZARDOUS MATERIALS PROGRAM ASSESSMENT

VISTA

I would like to schedule the DOT hazardous materials program assessment at the Aberdeen Plant on February 2-3, 1987. Initial conversations with Joe Higgenbotham and Dick Frohreich indicate this would be an acceptable time for the plant. I expect the assessment to last 1-1½ days, beginning on Monday afternoon, February 2.

As stated in an earlier memo, the first round will be structured as a working or problem identification review rather than an audit.

A memo, detailing what information is needed by us prior to the assessment, will be sent to those persons directly involved with the assessment.

At this point in time, the exact members of the assessment team are unknown. Tom Grumbles, an S&T Houston staff member, plant representative from another location, and myself will comprise the team. You will be informed of the participants names as soon as they've been chosen.

Please confirm the above dates so a specific schedule can be made. Call Tom Grumbles or me if you have any comments or questions.

M. M. Goodreau /ajo

M. M. Goodreau

ajo/2

cc R. A. Frohreich
V. Messick
J. Higgenbotham
R. T. Ferrell
J. Frederick

TO: Distribution

FROM: M. M. Goodreau
DATE: January 19, 1987

Interoffice Communication

SUBJ: DOT HAZARDOUS MATERIALS PROGRAMS ASSESSMENT

VISTA

A DOT hazardous materials program assessment is tentatively scheduled for the Aberdeen Plant on February 2-3, 1987. The following materials should be sent to me prior to the assessment:

1. A list of all persons, or job titles, responsible for preparing materials for shipment. This includes samples, wastes, bulk and empty shipments.

2. A list of all materials shipped out of the Aberdeen Plant and the container size, e.g., rail, truck, drum, sample. As stated above, the list should include samples, wastes, bulk and empty shipments.

When we arrive at the plant, the following materials should be readily accessible for our review:

1. Completed shipping papers, e.g., Bill of Ladings, Empty Railcar Return Instructions, Uniform Hazardous Waste Manifests, Federal Express or Emery Shipping documents.

2. Resource materials used for DOT compliance.

3. Any written procedures on how shipments (all sizes, all modes) are prepared for transportation.

Having the above ready for review will greatly increase the effectiveness of the assessment team's in-plant time.

Also enclosed is the Vista assessment criteria for your information. Please call Tom Grumbles or me if you have any questions.

M. M. Goodreau/ajo

M. M. Goodreau

ajo/2
Enclosure
cc w/o att: R. T. Ferrell, T. G. Grumbles, John Friend

Distribution:

R. A. Frohreich
J. Frederick
Lab Supervisor
V. Messick
J. Higgenbotham

VAB.0001175317

F27.1

TO: Distribution

FROM: M. M. Goodreau
DATE: June 2, 1987

Interoffice Communication

VISTA

SUBJ: **DOT HAZARDOUS MATERIALS PROGRAM ASSESSMENT**

The subject assessment has been rescheduled for Tuesday and Wednesday, June 9 and 10. Bill McClain from the Legal Department, and I will be performing the assessment. As we've previously discussed, the first assessment will be structured more as a working or problem identification review rather than an audit.

I'd like to start off on Tuesday morning at 8:00 discussing how the assessment will be conducted and what topics will be covered. We will be reviewing sample, waste, bulk and empty shipments in various modes of transportation. At the end of each review, we will provide guidance on what regulations to use and how to use them. We will work through the appropriate regulations using actual plant shipments. We are bringing written examples of properly packaged, labeled, marked, etc. materials shipped from the Aberdeen Plant.

I plan to review bulk and empty bulk, including drum, shipments first. Those persons involved in preparing these type shipments for transportation by highway or rail should be available during the review to answer questions. Anyone desiring to participate in the "training" on these particular shipments is welcome to attend. The same is true for waste and sample shipments.

If time allows, I'd like to review the transport terminal shipments and back-hauls on Tuesday afternoon. However, if the plant shipments consume the whole day, I'd like to begin reviewing the transport terminal operations at 8:00 a.m. on Wednesday.

Feel free to arrange the schedule as it best suits the plant. Contact Bill McClain or I if you have questions or comments prior to the assessment.

M. M. Goodreau
M. M. Goodreau

ajo
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DISTRIBUTION: John Friend, Harold Coleman, Jack Little, Dave Hollis
Dick Frohreich, Ron Gilreath, Tom Grumbles,
Bill McClain, Ralph Ferrell

RECEIVED
JUN - 8 1987

F27.1

RECEIVED
MAY 26 1987

TO: Distribution

FROM: M. M. Goodreau
DATE: May 20, 1987

Interoffice Communication

VISTA

SUBJ: DOT HAZARDOUS MATERIALS PROGRAMS ASSESSMENT

A DOT hazardous materials program assessment is scheduled for the Aberdeen Plant Wednesday, June 10 and possibly Thursday morning, June 11. The following materials should be sent to me prior to the assessment:

1. A list of all persons, or job titles, responsible for preparing materials for shipment. This includes samples, wastes, bulk and empty shipments.

2. A list of all materials shipped out of the plant, the container size, e.g., rail, truck, drum, sample, and mode(s) of transportation, e.g., highway, water, air. As stated above, the list should include samples, wastes, bulk and empty shipments.

When we arrive at the plant, the following materials should be readily accessible for our review:

1. Completed shipping papers, e.g., Bill of Ladings, Empty Railcar Return Instructions, Uniform Hazardous Waste Manifests, Federal Express or Emery Shipping documents.

2. Resource materials used for DOT compliance.

3. Any written procedures on how shipments (all sizes, all modes) are prepared for transportation.

Having the above ready for review will greatly increase the effectiveness of the assessment team's in-plant time.

Also enclosed is the Vista assessment criteria for your information. Please call Tom Grumbles or me if you have any questions.

M. M. Goodreau

M. M. Goodreau

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Enclosure

cc w/o att: R. T. Ferrell, T. G. Grumbles, J. Friend

DISTRIBUTION: R. A. Frohreich, R. Gilreath, J. Little, H. Coleman

A

TO: Distribution

FROM: M. M. Goodreau
DATE: June 2, 1987

Interoffice Communication

VISTA

SUBJ: DOT HAZARDOUS MATERIALS PROGRAM ASSESSMENT

The subject assessment has been rescheduled for Tuesday and Wednesday, June 9 and 10. Bill McClain from the Legal Department, and I will be performing the assessment. As we've previously discussed, the first assessment will be structured more as a working or problem identification review rather than an audit.

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I plan to review bulk and empty bulk, including drum, shipments first. Those persons involved in preparing these type shipments for transportation by highway or rail should be available during the review to answer questions. Anyone desiring to participate in the "training" on these particular shipments is welcome to attend. The same is true for waste and sample shipments.

If time allows, I'd like to review the transport terminal shipments and back-hauls on Tuesday afternoon. However, if the plant shipments consume the whole day, I'd like to begin reviewing the transport terminal operations at 8:00 a.m. on Wednesday.

Feel free to arrange the schedule as it best suits the plant. Contact Bill McClain or I if you have questions or comments prior to the assessment.

M. M. Goodreau

M. M. Goodreau

ajo
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DISTRIBUTION: John Friend, Harold Coleman, Jack Little, Dave Hollis
Dick Frohreich, Ron Gilreath, Tom Grumbles,
Bill McClain, Ralph Ferrell

(JF), JWW - For your info & have copied the attachment to this letter RAR

TO: Distribution

FROM: M. M. Goodreau
DATE: May 20, 1987

Interoffice Communication

VISTA

SUBJ: DOT HAZARDOUS MATERIALS PROGRAMS ASSESSMENT

A DOT hazardous materials program assessment is scheduled for the Aberdeen Plant Wednesday, June 10 and possibly Thursday morning, June 11. The following materials should be sent to me prior to the assessment:

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2. A list of all materials shipped out of the plant, the container size, e.g., rail, truck, drum, sample, and mode(s) of transportation, e.g., highway, water, air. As stated above, the list should include samples, wastes, bulk and empty shipments.

Completed wk of 6-1

When we arrive at the plant, the following materials should be readily accessible for our review:

1. Completed shipping papers, e.g., Bill of Ladings, Empty Railcar Return Instructions, Uniform Hazardous Waste Manifests, Federal Express or Emery Shipping documents.

2. Resource materials used for DOT compliance.

3. Any written procedures on how shipments (all sizes, all modes) are prepared for transportation.

Having the above ready for review will greatly increase the effectiveness of the assessment team's in-plant time.

Also enclosed is the Vista assessment criteria for your information. Please call Tom Grumbles or me if you have any questions.

M. M. Goodreau

M. M. Goodreau

ajo
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Enclosure

cc w/o att: R. T. Ferrell, T. G. Grumbles, J. Friend

DISTRIBUTION: R. A. Frohreich, R. Gilreath, J. Little, H. Coleman

DOT HAZARDOUS MATERIAL TRANSPORTATION PROGRAMS ASSESSMENT DRAFT

Purpose & Scope - To review the company's procedures and practices for the transportation of hazardous materials, in order to assure compliance with applicable DOT regulations.

The assessment will be done at all locations having responsibility for the movement of hazardous materials. This will include manufacturing sites, research and development, and headquarters departments. The assessment will focus on:

A. Shipping paper preparation

B. Product/material classification

C. Placarding, marking and labeling

D. Packaging determination (container specifications, etc.)

E. Administration (COEDS Hazardous Material File, education and training, recordkeeping, etc.)

Procedure - The plant site or other company location to be reviewed will be contacted to arrange an agreeable date for the assessment. The assessment will be performed by Biomedical & Environmental Affairs staff and other appropriate personnel involved in the transportation of hazardous materials. The review criteria and schedule will be sent as applicable well in advance to allow the location to prepare for the on-site activities.

A closing conference will be held to review and discuss the review team's findings.

A written report with findings and recommendations will be sent to an agreed upon distribution.

HAZARDOUS MATERIALS AUDIT CRITERIA

A. Organization of Department/Function

1. Responsible persons
2. Communications in-plant
3. Communications ex-plant

B. Resources

1. Availability of regulations.
2. Knowledge of resources

C. Education and Training

1. Education and training practices.
2. Availability of training resources.

D. Shipping Papers (All Modes)

1. Preparation of hazardous material shipment BOL's.
2. Non-COED shipment BOL preparation.
3. Laboratory sample shipment paperwork.
4. Preparation of "Empty-Return" BOL's (vendor containers, off-spec products, etc.).
5. Preparation of BOL's for hazardous waste shipments.
6. Preparation of switch lists for rail moves.
7. Administration of BOL preparation for terminal and warehouse shipments.

E. Marking, Labeling, and Placarding

1. Determination of placarding requirements.
2. Responsibility for placard requirements.
3. Procedures/methods for affixing placards.
4. Spare placards availability.
5. Pre-trip inspection report content and administration.
6. Marking, labeling and placarding for portable tank containers.
7. Marking and labeling for hazardous waste shipments.
8. Placarding, marking, and labeling for terminal shipments.

F. Loading/Unloading Procedures

1. Pre-trip inspection procedures.
2. Monitoring procedures.

G. Packaging

1. Determination of required container specifications (drums, sample shipments, etc.).
2. Purchasing practices.
3. Administration of re-test dates for applicable containers.

H. Recordkeeping - Review of practices

I. Emergency/Leak Response Systems

1. Plant capability to respond to incidents
2. Plant Emergency call procedures

J. Exemption Administration (VCM, MeCl Trailer)

1. Administration of exemption requirements.

2. Location of files.

K. Personnel Interviews

1. Administrative staff

2. Hourly personnel

L. Spot-Check Inspection

1. Inspect active loading/unloading procedures

2. Inspect marking, labeling, placarding (to include OSHA tags).

30.2 1987 Water
(File)

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