

TGG: JCL: ERT: MJH: AJO: RF

TO: Distribution

XF: _____

FROM: T. G. Grumbles
DATE: August 28, 1990

Interoffice
Communication

SUBJ: RESPONSIBLE CARE DISTRIBUTION CODE OF MANAGEMENT PRACTICE

VISTA

You have been sent a copy of Vista's comments to CMA on the subject Code. Further, I wanted to draw your attention to the issue of our internal resources to implement portions of the Code. I only received written comments from two manufacturing locations, however, they are illustrative of the issue. The plants will have difficulty meeting distribution code obligations with existing staff and organization. As indicated by the attached comments, they will be looking to Houston, S&T and Environmental, for implementation help in multiple areas. However, we have the same staff and organizational problems here.

Based on this issue and the increasing DOT regulatory activity I am proposing to have a meeting in the near future to review our future needs in these areas and begin planning to meet them. I know S&T has some plans in the organization area and this meeting will help us all understand those as they relate to our future needs.

I'll contact you in the near future regarding a meeting date.

TGW

T. G. Grumbles

dlj
.14

Attachment

Distribution: R. D. Gamblin, G. Draper, P. C. Gowan, T. H.
Huffman, J. A. DeBernardi

VVV 000013531

FROM: VISTA OKC

TO: VISTA HOUSTON

AUG 13, 1990 3:58PM #274 P.01

TO: T.G. Grumbles

To	T.G. Grumbles	From	H. Garrison
Co.	VISTA	Co.	VISTA
Capit	600 Remond AL	Phone #	405-670-0210
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FROM: H. Garrison
DATE: August 13, 1990

Interoffice
Communication

SUBJECT: RESPONSIBLE CARE --- DISTRIBUTION CODE

VISTA

The following comments are offered on the proposed Distribution Code of Management Practices:

1. More than any other code reviewed thus far, this Code seems to be fashioned such that most of the self-evaluation and program development/revision/implementation will be at the corporate level. I am not aware of corporate staffing capable of addressing the demands and needs of this Code. Except for a very few items, the Plant staffing can not take on this expanded scope of responsibility. Specific areas where I feel this is the case:
 - 1.2 Regular evaluations of chemical distribution risks.
 - 1.3 Identification/implementation of risk reduction measures.
 - 2.1 Process of monitoring changes in, and interpretations of, regulations and industry standards.
 - 2.3 Ongoing program for providing guidance/information to carriers/contractors.
 - 2.4 Regular review of --- carrier and contractor compliance.
 - 3.0 Carrier Safety Fitness (in it's entirety).
 - 4.5 Ongoing program for providing guidance and information to customers, distributors and other receivers on proper unloading and storage procedures.
 - 4.6 Process for selecting/regular auditing of fitness of storage and handling facilities.
2. Throughout the draft, the phrases "member company chemicals", "member company requirements", and "member company facilities" are found. These should be changed to reflect singular possessive --- member company's. Otherwise it implies a much broader scope --- one that is far beyond Vista's resources and capability.

VVV 000013532

RESPONSIBLE CARE --- DISTRIBUTION CODE

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3. Item 5.3 makes sense when training emergency response agencies for our particular hazards and situation; however, as written, it seems to imply that our materials and facilities should be made available whenever they want them and for whatever reason.
4. From my perspective 5.4 and 5.5 can be combined. They are redundant with other codes. Specific dialogues on distribution will not occur. They will simply be a part of a general process of dialogue of other code subjects. A better item would be for a channel of dialogue to be established and maintained with
5. Although it does not impact OKC, Item 5.1 may be a problem for Vista. CTIRP addresses ground transportation incidents fairly well but does not address marine, pipeline or air transportation modes very well (if at all).
6. I (HDG) don't think this Code will be very effective without the carrier and contractor organizations having input and/or endorsing CMA's efforts. I don't see this Code impacting or influencing railroads who have monopolistic markets to do anything to change their practices proactively.

I just don't feel as good about this Code as I do others because there is too much that is outside the Plant's direct control or influence. If it was broken down according to a corporate responsibility and a local manufacturing responsibility, I might feel better about what will be expected of us and what its impact will be.

This response was prepared in large part with input from Brent White.



H. GARRISON
PLANT MANAGER

HDG/gsc
Code.813

cc: Brent White

VVV 000013533

**Interoffice
Communication**

To: T. G. Grumbles

From: J. Friend
Date: August 13, 1990

Subject: Responsible CARE's Distribution Code

VISTA

Tom Randolph and I reviewed the subject Code of Management Practice. We assume the following will apply:

1. S&T will be responsible for elements 1.2, 1.3, 2.3, 3.1, 3.2, 3.3, 4.5, 4.6 and 5.4.
2. Manufacturing will be responsible for elements 4.2, 4.3 and 5.1.
3. Manufacturing and S&T will both be responsible for elements 1.4, 4.1, 4.4 and 5.5.
4. Your group and S&T will both be responsible for elements 1.1, 2.1, 2.2, 2.4, 5.2 and 5.3.

Those items that Manufacturing has some responsibility for are all reasonable. However, we will have work to do in order to achieve full implementation. We have no comments on the other elements except that there will be a great deal of work required.


J. Friend

mbr

cc: TSR KLF

VVV 000013534