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Interoffice Communication

To R. E. Lehmkuhl
From T. G. Grumbles
Date November 24, 1980
Subject 1980 OVERALL OBJECTIVES: PROGRESS
(Your Memo of 11/18/80)

- (1) Periodic plant visits are made to discuss environmental and health issues with Plant Managers and staff. Environmental performance, permitting strategy, industrial hygiene sampling and medical testing are discussed. Methods of compliance with applicable state and federal regulations are reviewed. Administrative and procedural changes have been made at the plants to assure compliance with the new OSHA Medical and Exposure Records Access Standard.

Participation in AIHC, CMA, API and SDA allows Conoco Chemicals to maintain awareness of impending regulations as well as gain input to the standards setting procedure, before and after promulgation. Review of pertinent publications and participation in Conoco's Environmental Council also aid in being aware of and developing compliance strategies.

- (2) (a) The Material Safety Data Sheet revision program is progressing. The sheet itself has been redesigned and expanded and the internal review process developed. To date, new sheets for cresols are completed and sheets for 12 Chocolate Bayou products are in final draft form. Projected time for completion of all sheets is 6 to 8 months.

(b) The plants have submitted notifications and Part A permit application as required by RCRA. Inventories of hazardous waste are being removed from plant sites where it is prudent. Recovery, recycle, and disposal projects have been defined at all locations.
- (3) Sources for recognized and potential exposures have been identified at several plants and control design has been accomplished or implemented. These include such things as changes in loading rack equipment and procedures, process stream sampling methods, and process area fugitive emission control.

Employee education programs for VCM and benzene have been revised to reflect new technical information and changed in company policy.

Thomas G. Grumbles

TGG:dem

CCR 000002527



Interoffice Communication

To J. J. Hall

From R. E. Lehmkuhl

Date November 18, 1980

Subject INCLUSION OF ITEMS IN 1980 OVERALL OBJECTIVES

We need the following information by November 24 for inclusion in our 1980 objectives:

- (1) A short paragraph on what Conoco Chemicals has done to comply with federal and state regulations, and maintain cognizance of direction of new laws and regulations, to minimize costs while maintaining compliance for year 1980.
- (2) Where do we stand on:
 - (a) Reviewing the Chemical Labeling Program and initiation of the Safety Data Sheets?
 - (b) Development of a Solid Waste Program so that each plant is in compliance with RCRA?
- (3) A short paragraph on what has been done in Calendar Year 1980 to reduce employee exposure to toxic chemicals through engineering and administrative procedures.



R. E. Lehmkuhl

REL:dem



CCR 000002528