

Vista Chemical Company

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April 9, 1990

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1031.4

VISTA

Mr. Michael J. Wint
Process Development Manager
Church & Dwight Company, Inc.
469 N. Harrison Street
Princeton, NJ 08543

Dear Mr. Wint:

Attached is Vista Chemical's response to Church & Dwight's Environmental Interaction Questionnaire. It is somewhat difficult to speak to predicted trends in the U. S. or Europe in a reasonably short answer but we have tried to indicate the highlights of what we see. Also, we will be forwarding answers to questions IV.A. and IV.B. in the near future. If you would like to discuss the questionnaire response further, please contact me at 713-588-3445 or Roscoe Cooley in our Saddlebrook office.

Sincerely,



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

dlj

Attachments

cc: R. Cooley, M. Fortier-Saddlebrook

- R. Swantkowski, B. E. A. Larsen, R. Bryan, M. Sweet

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VISTA CHEMICAL COMPANY RESPONSE

Information required from raw material supplier for review of laundry detergent environmental interaction:

I. Corporate Information

A. Corporate Environmental Statement

What published statement has the corporation issued concerning environmental matters?

Vista has established an environmental policy statement. A copy is attached.

B. Performance

What is the corporation's current environmental record (reputation) locally, regionally, and at the state and federal levels? How has the corporation reacted to any environmental transgressions (spills, etc.)?

The company is in substantial compliance with all applicable environmental regulations. We believe that our reputation is good in the communities surrounding our plant, with the media, and with state and federal regulators.

C. Commitment

What has been done to improve environmental quality on a voluntary (above and beyond legislation) basis?

Vista's corporate policy is to exceed governmental regulations where feasible. We have voluntarily reduced emissions at our plants over the years. Based on SARA 313 reported emissions, plant emissions have dropped significantly at all locations since 1987. A press release regarding these efforts at the Lake Charles facility, where ALFONIC alcohols and LAB are produced is attached.

II. Key Trends

A. Industry

Are there any industry-wide trends that you are aware of which concern improvements to the environment or possible industry environmental liabilities? How will these trends affect the environmental reputation of the industry? Are there any pertinent international trends?

In regards to trends, we believe responsible members of the industry have fully recognized their environmental responsibility and the need to develop communication with the public to assure that public opinion is considered when initiating and prioritizing environmental efforts.

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Evidence of this trend is CMA's Responsible CARE program, a performance improvement initiative. Church & Dwight is also a CMA member committed to Responsible CARE, as is Vista, therefore, we've not provided details on this program.

As to international trends, it appears that Europe may be behind the U. S. from a regulatory standpoint but probably is ahead of the U. S. in terms of the growing impact of the public opinion on business. This has been most evidenced in the "green" movements, specifically focused on chemical products and operations. The "eco-labeling" or environmental friendly labeling trend is one that is passing from Europe to Canada and the U. S.

B. Corporate

Has the corporation instituted programs that will, in the future, effect the environmental interaction and reputation of the corporation?

Vista is working aggressively with communities and industries in the areas of our operations. The developing community outreach programs that involve information and education on the company's operations and emissions as well as community support programs such as "partners in education" and human services support.

Vista is developing programs and doing projects in our manufacturing sites that should allow us to become more pro-active in meeting future environmental requirements. Articles from our internal newspaper "ChemNews" describing some of these activities are attached.

III. Persuasion

A. Industry

What "pull", if any, does the industry as a whole have with government regulators and environmentalists?

The chemical industry as a whole has had limited "pull" with government regulators and environmentalists in the last several years. Vista works with industry groups such as CMA, the Society of Plastics Industry, Vinyl Institute, and the SDA to address scientific and technical issues in environmental regulations. The EPA has been under severe Congressional pressure as well as public pressure, to promulgate more and more regulations in the environmental protection. The need to promulgate quickly has often resulted in poor quality regulations as well as unreasonable compliance deadlines despite industry efforts.

B. Corporation

Does the corporation have any "pull" or "leverage" with government regulators and environmentalists?

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Vista actively participates in legislative and regulatory issues at a state government level and has had some success in influencing governmental activities in Louisiana and Maryland. Specifically plant personnel are very active in the Louisiana Chemical Association and the Maryland Chemical Council. Our Baltimore plant manager was recently elected Vice President of the Maryland CIC.

IV. Environmental Impact of the Material

A. Primary Degradation

What is the biodegradation characteristics and environmental fate of the material which we purchase? How was this information generated? If generated as internal reports, could we obtain copies?

B. Secondary Concerns

Are there any byproducts or coproducts generated in the operations which produce our material? Do you know of any environmental problems caused by these by-or coproducts? What raw materials are needed by you to supply our material? Do these materials cause environmental concern?

C. Releases or Exposures

Are there any records concerning environmental consequences of releases, spills, or other exposure to the material we buy from you, or it's by- and coproducts, or it's raw materials?

Vista has had no significant events, spills, releases, etc., that have resulted in records or problems concerning ALFONIC ethoxylates or LAS. We are not aware of other companies having such records or any such information in the public literature.

V. Trends Concerning Material

A. Direct Effects

Are you aware of any trends in industry or government which will effect the availability, regulatory status, environmental reputation, or general usability of the material we purchase from you? Any possibilities of technological changes that will render your material obsolete for use in a laundry detergent?

Vista believes LAB/LAS will continue to be the premiere, highest quality detergent intermediate available to the industry. To further establish this position, Vista has formed the Council for LAB/LAS Environmental Research (CLER) with Monsanto. CLER's goal is to provide communication and do research projects that will further establish the environmental acceptability and safety of LAB/LAS as a detergent material. In fact, CLER will be contacting your company in the near future to discuss CLER's activities.

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The Green movement in Europe has attempted to attack these materials based on a natural vs. synthetic comparison and CLER's work will assist in refuting non-scientifically based claims if the need arises. CLER is coordinating activities with the European soap and detergent industry.

B. Indirect Effects

Are there any trends that you expect will impact on the environmental, regulatory status, or usability of the by- or coproducts or raw materials that are associated with the material we purchase?

Vista sees no future trend that could impact the environmental or regulatory status of the by or coproducts produced in the manufacture of ALFONIC ethoxylates or LAB/LAS.

Raw materials used in the manufacture of these products, such as benzene and ethylene oxide have come under increasing regulatory scrutiny and control, but Vista believes we can manage these issues with prudent and proactive environmental programs.

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Vista Chemical Company

ENVIRONMENTAL POLICY

Vista Chemical Company produces and transports chemical products that can potentially impact the environment in the communities in which we conduct business. Vista believes that compliance with all laws and regulations related to environmental quality and public health protection is a *minimum* standard of acceptable practice. Vista Chemical Company is committed to improving Vista's environmental protection efforts to achieve performance levels exceeding those required by law.

Vista recognizes the responsibility we have to our employees, the surrounding communities, customers, carriers, contractors and government agencies to conduct our business activities according to the following environmental principles:

- Vista will inform and educate employees, surrounding communities, customers, carriers, contractors and government agencies of the health and environmental hazards of the chemicals we make, use and sell. These activities will involve recognizing and responding to community concerns regarding environmental issues.
- Vista will continually reduce the risk to employees and neighboring communities posed by chemical substances used, produced and transported within our communities.
- Vista will continue to take steps to reduce emergencies involving chemical releases that would impact the environment and surrounding communities.
- Vista will foster and maintain an awareness of and sensitivity to environmental responsibility among our employees through an ongoing internal communication program.
- Vista will maintain an environmental quality assurance program to ensure that operations are in full compliance with Company policies and procedures, governmental permit limitations and regulatory requirements.
- Vista will determine how each new or existing product can be made, used, handled and disposed of while protecting employee safety, public health and the environment.
- Vista will make safety, health, environmental control and waste minimization essential and integral parts of process and facility design, construction and operation.
- Vista will reduce waste generation in the air, water and soil through employee involvement and the pursuit of source-control technology.
- Vista will work with the government and other parties in developing responsible laws, regulations and standards to protect employees, surrounding communities and the environment.

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CHEM VISTA NEWS

ENVIRONMENTAL RESPONSIBILITY

VISTA GOES ABOVE AND BEYOND ENVIRONMENTAL COMPLIANCE

Clean air, clean water, and a healthy environment—we all treasure these aspects of a healthy world for ourselves, our children, and for future generations.

"At Vista, we are proud of our record on safety, health and the environment, and of our good relations with the communities we call home," said John D. Burns, chairman, president and chief executive officer.

But do we see ourselves and our industry as the public sees us? Can we afford to rest easy with our own record, while the public becomes more and more concerned with the impact of our industry on the environment we share?

"In examining these questions, Vista management chose to strengthen the company's environmental efforts with the adoption of an Environmental Policy," Burns stated.

"We believe this statement embodies our philosophy and principles for environmental compliance, control practices and public health protection," Burns continued. "The principles of our Environmental Policy will be the basis for our environmental decisions through the 1990's and beyond."

In addition to Vista's Environmental Policy, the company also supports a new



chemical industry initiative called Responsible Care, sponsored by the Chemical Manufacturers Association (CMA). In essence, Responsible Care is a performance-improvement program that focuses on health, safety and environmental quality. The CMA board approved the initiative and participation in Responsible Care is now an obligation of membership in the association.

"Implementation of the principles of our Environmental Policy is a long-term effort," said Tom Grumbles, environmental quality manager. "This policy and resultant programs of work will be a continuous effort to improve our performance. It's not just words on paper. It's action."

He added, "Responsible Care is the beginning of a way of life for Vista, the chemical industry and the CMA. Most of the proactive concepts, ideas and programs that Vista has been developing and putting in place will find a home under the Responsible Care umbrella."

The Responsible Care program has the following major components:

- Codes of Management Practices: Each code will identify the elements of good management practices in health, safety and environmental areas, and define performance objectives. Initially, these codes will be considered for emergency response, transportation, release reduction and management, and plant operations.

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- Public advisory panels: A national advisory panel composed of environmental, health and safety leaders will critique

(cont'd on page 2)

**A sampling of articles
about Vista's
environmental
efforts that appeared in
ChemNews, a monthly
employee publication.**

GOING ABOVE AND BEYOND

(continued from page 1)

management practice codes and identify areas they believe require industry action. Community-level advisory panels will be encouraged.

- Company self-evaluations of management practices: Each company will use performance objectives to measure performance and improvement. This data will be useful in identifying areas in which individual companies need assistance in improving performance and in measuring collective industry improvement.

- Executive leadership groups: Composed of member company executives, these groups will meet regularly to share experiences, review practice codes, discuss progress and identify areas where companies may offer or receive assistance in reaching progress milestones.

Burns stated, "No matter what role you play in Vista's success, our Environmental Policy and Responsible Care apply to you. These principles are more than an attitude expressed by management. They must guide the way you and I do business. We will continue to go above and beyond compliance to improve our health and safety performance record."

VCM PLANT RECEIVES ENVIRONMENTAL AWARD

"In today's world, environmental compliance and performance are top priority issues," observed Dick Conrad, plant manager at Vista's Lake Charles, La., VCM Plant (LCVCM). "To achieve success in this area requires the same dedication that we've always applied to our safety programs."

LCVCM's employees were recently recognized for the outstanding results they achieved in environmental compliance during 1988. The plant was awarded one of two environmental achievement awards in the vinyl chloride monomer (VCM) category by the Vinyl Institute.

The award measures a plant's ability to control and minimize VCM emissions and is given to the top two performers in the category.

This year's award recognizes performance in the following areas:

- relief valve discharges,
- rupture disc releases,
- oxychlorination reactor loss

exceedances,

- manual vents, and;
- incinerator bypasses.

"VCM's employees are working hard to maintain and improve the current level of performance," concluded Conrad.

"I'm proud to be a part of their effort."



PLANT RECEIVES FIRST PLACE IN ENVIRONMENTAL ACHIEVEMENT

In May, employees at Vista Chemical's Aberdeen, Miss., PVC Plant received the Vinyl Institute's (VI) first place award in environmental achievement. The award is the second consecutive award for the PVC plant in the three years the awards have been given.

"This achievement is certainly a quality performance every day by Aberdeen's employees," said Bob Seymour, Aberdeen's plant manager. "It's one that benefits both our employees and the Aberdeen community."

Vista is one of six VI member companies that received the award this year. The award was developed to recognize member companies who

receive a perfect score from the VI for having no:

- relief valve discharges,
- rupture disc releases,
- residual VCM exceedances on

slurry,

- reactor opening loss exceedances,
- manual vents, and;
- incinerator bypasses.

"This is an award that every employee at Aberdeen can be proud of -- whether they are involved in preventing VCM releases or operating and maintaining equipment to ensure minimum emissions," concluded Seymour.

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CADMIUM-FREE PVC: PROTECTING THE ENVIRONMENT WITH NEW RECIPES

An environmental issue faced by the chemical industry in Europe, and now in the United States, is the presence of cadmium and other heavy metals in landfills.

The industry is faced with taking action on two fronts:

- Eliminating cadmium from plastics and pigments that are disposed of in municipal waste landfills.

- Reducing disposal costs for ash from incinerated waste that may have

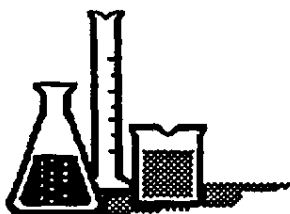
high concentrations of cadmium and other hazardous materials.

Currently, this ash must be disposed of in costly landfills targeted especially for hazardous waste.

American vinyl producers are taking the initiative to remove cadmium, a heat stabilizer, from their recipes. Along with other member companies of The Vinyl Institute, Vista has pledged to remove cadmium from its PVC compounds, ac-

cording to Joe Ledvina, director of environmental activities.

FINDING NEW FORMULATIONS. Vista's research and development group in Austin, Tx., is working with several outside suppliers to develop alternatives to the cadmium stabilizers used in some of these recipes.



"We're looking for alternatives to cadmium that perform as well under process conditions," explained Steve Hookansen, manager, applications and development.

Concurrent testing of non-cadmium stabilizers is being conducted in Vista laboratories in Austin and at Blane Polymers to speed the process of finding alternatives and get them to market.

Hookansen's group has tested non-cadmium stabilizer systems in several customer applications in the field.

"The non-cadmium stabilizer systems performed very well under normal production conditions," noted Hookansen.

REDUCED EMISSIONS IN LAKE CHARLES

Vista's Lake Charles, La., Chemical Complex reduced SARA-reportable emissions in 1988 by 57%, or 2.1 million pounds over 1987. Most of the reduction involved a dramatic decrease in reported air emissions.

Several factors contributed to the decrease. More than 25% of the reduction was the result of equipment modifications and process improvements.

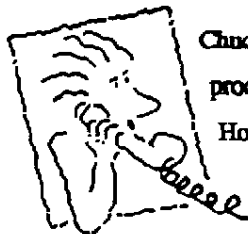


The remainder was due to updated calculation methods and the discovery that emissions of alumina should not have been included in 1987 calculations.

"We've continued to make significant changes at the three Lake Charles plants to make sure the chemicals we use and make are not discharged to the environment," said John Friend, plant manager at the Lake Charles Chemical Plant.

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SPREADING THE WORD ABOUT ENVIRONMENTAL CONCERNS



Chuck Grbcich, a process engineer in Houston, finds himself face-to-face with

environmental regulations every day.

Grbcich is part of the team working on the biochemical oxygen demand (BOD) project at Vista's Aberdeen, Ms., PVC Plant. A new regulation calls for further reduction of vinyl chloride and other organic compounds that are released to the plant's wastewater ponds.

"I need to be familiar with environmental trends and regulations so that I can apply them to my work," Grbcich said.

"Because of their far-reaching effects, environmental concerns and regulations are something everyone at Vista needs to be aware of," said Ed Taylor, senior environmental specialist.

"Environmental issues impact virtually every aspect—manufacturing, supply and transportation; engineering, marketing—of our business."

Armed with a checklist and trained by a member of Vista's environmental group, Lane Claybourn, ex-plant analyst, audits product transfer terminals and toll processors. The audit checklist measures the quality, environmental, safety and

health performance of these ex-plant operations.

"During an audit," he said, "I need to know what to look for to ensure the terminal's compliance with current laws."

"So many employees need a basic awareness of environmental issues to do their jobs effectively," added Joe Ledvina, director of environmental activities.

"We found, through company-wide surveys, that environmental training was a major need among new-hires and veteran employees alike."

To spread the word about environmental concerns and the laws affecting the chemical industry, Taylor, Ledvina, Bill

Taylor: "Environmental issues impact virtually every aspect of our business."

McClain, senior counsel, and David Cohen, counsel, hold basic environmental awareness seminars that cover air, soil, water and groundwater regulations. The program also addresses permitting processes and solid and hazardous waste management.

The first seminars were held for members of the supply and transportation and process engineering departments in Houston.

After attending an environmental seminar, Brett Earl and Doug Dolan, process engineers, feel more comfortable with environmental issues.

"All the language I heard during the presentations was new to me, but I feel better prepared to recognize potential environmental impacts on my work," commented Earl.

"Emission regulations, to varying degrees, are a constant factor in my work," added Dolan. "A good working knowledge of environmental laws helps me do my designing work right the first time."

"We want employees to be aware that the corporate environmental and legal groups are a resource for answering any environmental questions they may encounter," concluded Taylor. He can be reached in Houston at 713/588-3492.

MAKING SURE PLANT CHEMICALS STAY WHERE THEY BELONG GROUNDWATER TESTING BEGINS IN MOSSVILLE

Vista and Conoco have started a joint drilling project within the Mossville subdivision to test for the presence of ethylene dichloride (EDC).

Mossville is located on the western boundary of Vista's Lake Charles, La., VCM Plant. Previous testing of private water wells found no chemicals in the water table under Mossville.

"This drilling project is part of Vista's continuing efforts to make sure the chemicals we use and make at our plant stay inside the plant property," said Dick Conrad, plant manager.

A large truck—a test lab on wheels—been parked at various locations on

Mossville streets. Technicians on the truck have drilled two-inch holes and inserted measuring devices to depths of ten to seventy feet to test for EDC.

In the past, Vista detected traces of EDC directly underneath the VCM plant and near the plant's boundary next to Mossville. To recover the EDC, Vista began an ongoing groundwater remediation program, which means the company pumps the groundwater out, treats it to remove contaminants and replaces it.

PREVENTION IS THE BEST CURE. Past practices during the plant's early years of operation contributed to the presence of EDC in the groundwater.

According to Conrad, precautions against this happening in the future have been taken.

"We've investigated potential sources of leaks," he said, "and installed new and better equipment, such as storage tank bottoms with special protection to prevent corrosion, a major cause of leaking in the past."

EDC is used to make vinyl chloride monomer (VCM). VCM is used at other Vista locations to make polyvinyl chloride (PVC).

NEW GUIDELINES TO MINIMIZE DELAY, WASTED EFFORT DESIGNING WITH OUR ENVIRONMENTAL FUTURE IN MIND

Hazardous waste produced in this country is a growing concern to the American public and to government and industry.

But whose responsibility is it?

"Vista recognizes its environmental responsibility to employees, surrounding communities and government agencies," said Tom Grumbles, environmental quality manager.

In July 1989, Vista's Environmental Policy was formally adopted. One of the specific actions outlined by the policy is

to continue "to make safety, health, environmental control and waste minimization essential and integral parts of process and facility design, construction and operation."

That's where Vista's Engineering Environmental Guidelines team fits in.



According to Ed Taylor, senior environmental specialist, guidelines developed by the team will minimize project

delays and wasted effort by allowing for consistent decision-making while focusing on future environmental compliance and protection.

Team members are Taylor; David Cohen, counsel; Tom Heller, senior process engineer; Neil Rasmussen, chief mechanical engineer, LCCP; Jerry Stone, chief engineer, maintenance and technical services; and Curt Watson, project manager, engineering.

(cont'd on page 6)

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WASTEWATER PROJECT UNDERWAY IN LAKE CHARLES



A new level of environmental compliance is on the horizon for Vista's three-plant chemical complex in Lake Charles, La. (LCCC).

To meet future environmental obligations, employees at the Lake Charles Chemical, VCM and LAB plants are taking a hard look at their respective wastewater systems.

Two upcoming environmental requirements represent the trend toward stricter environmental compliance.

The first, expected to go into effect before the end of this year:

- expands the list of hazardous materials;
- reduces the allowable concentrations for these materials, including benzene and ethylene dichloride (EDC), and
- will cause all in-ground facilities that handle hazardous materials to be classified as hazardous waste treatment facilities.

"As our systems currently exist in Lake Charles, the ponds and lagoons that handle benzene and EDC would automatically become hazardous facilities,"

said Curt Watson, project manager.

This means high administrative and construction costs for Vista to upgrade and maintain the ponds and lagoons as hazardous facilities.

The second, expected to become effective at the end of 1992, calls for a substantial reduction in the total amount of contaminants in wastewater released to local waterways.

A project team has been formed to determine what steps are necessary to comply with these and future environmental requirements.

The philosophy behind the LCCC wastewater project, according to Watson, is to spend environmental dollars on waste minimization rather than on building bigger and bigger waste treatment facilities.

"We want to build a treatment system that, with slight modifications, can meet future regulations," he said.

Team members are Watson; David Cohen, counsel; Sandra Corkran, process engineer, LCVCM; Tom Heller, senior process engineer; Joe Ledvina, director,

environmental activities; Mike McHugh, process engineer, LCLAB; Ralph Raines, senior project engineer; Jim Shamburger, senior process engineer, LCCP; and Mark Whitman, process engineer, LCCP.

NEW GUIDELINES

(cont'd from page 5)

"By developing engineering environmental guidelines, we are addressing elements of Vista's Environmental Policy and can reduce potential environmental risks," said Taylor.

The team is currently working with Vista's three-plant Lake Charles, La., Chemical Complex (LCCC). Facing two new environmental requirements, LCCC has an immediate need to revamp its wastewater treatment systems.

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For additional information about the articles in this publication or Vista's other environmental activities, please call or write:

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Manager, Biomedical and
Environmental Affairs
Vista Chemical Company
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Houston, TX 77079
713/588-3445

Press Release

VISTA

89-34

FOR IMMEDIATE RELEASE

CONTACT: John Friend
(318) 494-5341
or Mike Hayes
(318) 494-5437

**Vista Chemical reduced emissions in 1988,
expects continuing reductions through early '90s**

LAKE CHARLES, La. (Sept. 21, 1989) — Vista Chemical Company today announced it has reduced by 57%, or 2.1 million pounds, the reported amount of certain chemicals it released from its Lake Charles Chemical Complex to the environment in 1987. The company reported to the Environmental Protection Agency (EPA) a total release of 1.6 million pounds in 1988, down from the 3.7 million pounds reported in 1987.

Most of the 57% reported reduction involved a dramatic decrease in reported air emissions. Vista's Lake Charles Chemical Complex reported a reduction of 53%, or 1.6 million pounds, in air emissions—from 3 million pounds in 1987 to 1.4 million pounds in 1988.

Several factors contributed to the company's 57% decrease in reported emissions. More than 25% of the reported reduction was the result of equipment modifications and process improvements—which means the company released fewer chemicals to the environment during 1988.

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VISTA ENVIRONMENTAL
Continued

The remainder of Vista's total reported reduction was the result of other factors—the updated calculation methods the company used to determine its emissions, which provided a more accurate emissions total, and the discovery that emissions of one inert substance, uncalcined alumina, should not have been included in 1987 calculations.

"We've continued to make significant changes at our three Lake Charles plants to make sure the chemicals we use and make are contained within the plants and not discharged to the environment," said John Friend, plant manager, Vista's Lake Charles Chemical Plant. "We're pleased with the progress we've made so far.

"Process modifications in the plant led to a decrease of 560,000 pounds per year of ethylene discharged to the atmosphere during 1988. In addition to the reduction in air emissions, we made other process improvements to give plant personnel greater control over the plant's wastewater system. This resulted in a 10,000-pound reduction in chemicals released in the plant's wastewater discharge."

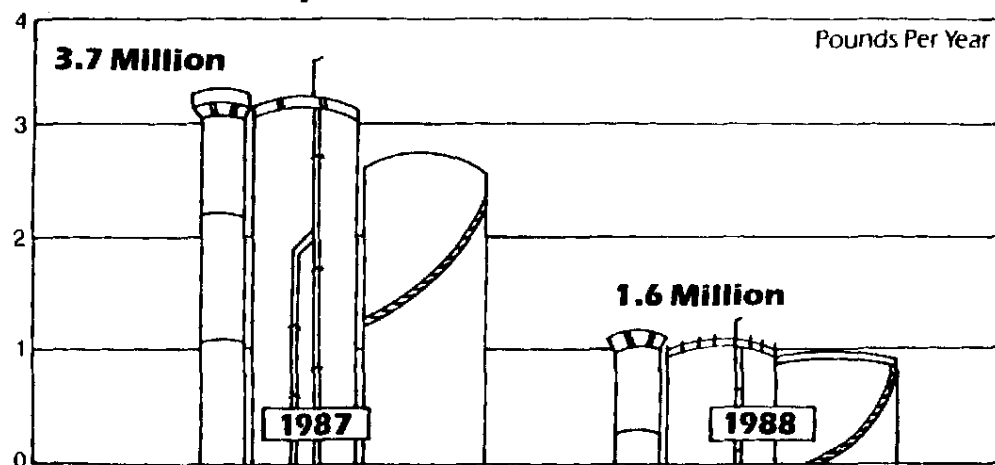
Vista submitted its 1988 "Toxic Chemical Release Inventory" to the EPA as required under the Superfund Amendments and Reauthorization Act (SARA), passed by Congress in 1986. Under SARA, companies that manufacture, import, process or otherwise use any of over 400 chemicals must file an annual report containing amounts of each chemical released into the air, water and land.

"Vista was hard at work reducing its emissions long before the SARA legislation came about, and we're pleased with the success of all of our environmental improvement programs," said Friend.

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**Reported Emissions at
Vista Chemical's Lake Charles
Chemical Complex**



VISTA

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**Interoffice
Communication**

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: April 12, 1990

SUBJ: PROGRESS REPORT

VISTA

1. TGG participated in Toxic Substances Control Act (TSCA) training in R&D. The training included an overview of the act and regulations and specific R&D compliance procedures.
2. TGG participated in a meeting with R&D personnel to begin to define the process needed to assure Premanufacture Notifications will be filed in a timely manner to assure commercialization. The EPA is beginning to require more and more data on PMN submittals which results in longer lead times to prepare PMN's and significant expenditures to obtain the data.
3. Senior Management has approved a headquarters recycling plan for paper and aluminum cans. MJH is working with the VHEA and Public Relations to implement the program. An official announcement of the recycling program is forthcoming.
4. ERT participated with S&T in the Quality Vendor Audit at Shaft Warehouse located in Houston. S&T will issue the final audit report.
5. The DOT training and assessment committee held its first meeting. It was decided that DOT audits of company locations would resume by late June, 1990 and DOT training would begin by September, 1990. We are planning to hold a seminar with Transportation Contacts sometime in June.
6. 16 COEDS ordered MSDS's were sent out and one new label was entered in the system.

TG

T. G. Grumbles

dlj

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