

TGG: JGE: EBT: MJH: AJO: RF
XF: NONE

TO: Distribution

FROM: T. G. Grumbles
DATE: February 15, 1990

Interoffice
Communication

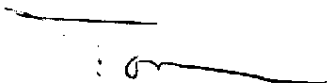
SUBJ: RESPONSIBLE CARE\ENVIRONMENTAL POLICY COMMUNICATIONS IN
HOUSTON: RDG MEMO OF 2/8/90

VISTA

The need to accomplish the communication of the subject items is discussed in RDG's memo. I have enclosed a copy of the support materials that have been sent to the plants and R&D.

Although the involvement of Houston staff in some of the program areas may be less than plant personnel, the need to communicate the Company's direction and involvement in industry efforts is important. The feedback mechanism described in this package is as important to use in headquarters as the plant locations.

I can assist you in the communication if you need help.


T. G. Grumbles

dlj
.1008

Enclosure

Distribution: R. J. Andersen, R. V. Dale, J. A. DeBernardi, G. G. Draper, H. R. Flammer, N. C. Frost, T. H. Huffman, G. W. Inbody, B. R. Johnson, B. E. A. Larsen, W. J. B. Vogel, V. W. Weiss

VVV 000011055

To: Plant Managers, Virgil Weis

From: Tom Grumbles

RETURN TO TGG

Date: Feb. 2, 1990

Interoffice
Communication

Subject: Environmental Policy/Responsible Care
Communication Content and Timing

VISTA

Enclosed is a proposed communication text and overheads to help you with the introduction of Responsible Care at your location. Please call me or Mike Reynolds with your comments by Feb. 14. We will make any necessary changes and distribute final packages to you that week. At that time, you'll receive a completed script, prepared overheads, enough survey cards for all your employees and copies of the Vista environmental policy. You already have a plaque of the policy as well as the videotape to use with the presentation.

As part of your introduction, we're asking you to collect some feedback on your employees' opinions about Vista's efforts to protect the environment.

This initial information will be the beginning of a "dialogue" with employees and will help us focus some of our future efforts on what employees think is important. While the rest of the presentation is largely suggested, we'd ask that you stick closely to the instructions in these portions of the script to ensure the quality of the data we collect. When presentations are completed, I ask that you return the completed cards to me in Houston and I'll prepare compilations of the data for all of us to use.

Also enclosed is an Executive Alert from CMA describing their national communication program for Responsible Care. This will occur the first weeks in April, so our goal should be to complete our introduction of Responsible Care by then.

cc: Tom Huffman
Jim DeBernardi
Debs Gambler
John Weidner
Mike Reynolds
Environmental Coordinators
Safety Directors

VVV 000011056

(Please have this slide on when people begin entering the room. Take it off only when you are ready to begin the program.)

Protecting the Environment...

The air, water and land

And the health and safety of:

- Employees
- Plant neighbors
- The community



VVV 000011057

Good morning (afternoon).

In just a moment, I'm going to pass out a card to each of you. I'd appreciate it if you would take a few moments and fill it out.

(Don't pass out the card until you finish the explanation)

The front of the card looks like this, and I'd like you to answer each of the three questions shown here.

For example, the first question says:

What kind of a job do you think Vista is doing protecting the environment?

To answer the question, please circle one of the numbers below. If you think we're doing a very good job, circle one of the higher numbers. If you think we're doing a bad job, circle one down at the lower end of the line. If you think the answer is somewhere in the middle, then pick one of the middle numbers.

Then go on to the next question.

How is Vista doing protecting employees' safety and health? Again, circle one number to indicate how we're doing.

Finally, circle one number to give an answer for the third question:

How is the company doing protecting the health and safety of people who live near our plants?

Please let us know how we're doing

Circle a number on an answer for each question below

1. What kind of a job do you think Vista is doing protecting the environment?

1 2 3 4 5 6 7 8 9 10
Very Bad Job Very Good Job

2. How is Vista doing protecting employees' safety and health?

1 2 3 4 5 6 7 8 9 10
Very Bad Job Very Good Job

3. How is the company doing protecting the health and safety of people who live near our plants?

1 2 3 4 5 6 7 8 9 10
Very Bad Job Very Good Job

Before we start, take just a few minutes to fill out this card.

Please circle only one number per question.

VVV 000011058

Don't forget the back of the card.
We're not going to ask you to sign
the cards, but when see how the
answers stack up, we want to be
able to tell something about the
people who answered the
questions.

First, we want you to tell us your
age. Circle one of the groups:

Under 25 25-34 35-44
45-54 or Over 55

Then circle either
Male or Female

The next is length of service in
years:

0-5 6-10 11-15 16-20
21-25 or 26+

Then your general work
classification, either salaried or
hourly.

Finally, write in your work
location. That means (tell them
specifically, Houston, Saddlebrook,
Lake Charles Chemical Plant, LAB
Plant, R&D, etc.)

(Now pass out the cards, put
overhead number one back up, and
wait until all cards are completed.
Then collect the cards and go on
with your presentation.)

Don't forget the back of the card!!!

Please circle one answer for each question

Age: Under 25 25-34 35-44 45-54 Over 55

Sex: Male Female

Length of Service (Years): 0-5 6-10 11-15 16-20 21-25 26+

Work classification: Salaried Hourly

Work location: _____

VVV 000011059

Thanks for your help. The results of our little survey will be reported in ChemNews later this year and will be used to help us plan further communication with you.

Well, as you probably guessed, we're here today to talk to you about Vista's concern about the environment. But as you can see, we want to listen, too.

I'm sure you're well aware that making and shipping our products can impact the environment in the communities where we live and work.

But you may not be aware that Vista is committed to improving our environmental protection efforts and achieving performance levels exceeding those required by law. And we're doing something about it.

We've just adopted a new environmental policy to establish basic goals and operating philosophies for everything we do.

Why are we here?

Talk about Vista's concern for the environment
Vista produces, transports chemicals that can
impact the environment in the communities where
we live and work

The Company is committed to improving its
environmental protection efforts

New environmental policy

Support of a new chemical industry initiative
known as Responsible Care

And we're giving our full support to a new chemical industry effort known as Responsible Care.

The Vista policy and the programs of work we're planning will take the form of a continuous effort to improve our performance. The policy isn't just words on paper.

These actions are supported by top management and are important because our efforts will impact the company's bottomline, and ability to continue to operate our business.

VVV 000011060

Today we're going to watch a short video that talks about Vista's environmental protection efforts, as well as our efforts to protect your safety and health, and the safety and health of the community.

The video will also cover how these efforts relate to the new chemical industry's program known as Responsible Care.

Then you'll find out more about what we're doing to make Responsible Care a part of our daily work practice.

And later, we'll give you a copy of Vista's new environmental policy,

You'll have an opportunity to ask questions,

and you'll have an opportunity to give us some more feedback on the Company's environmental efforts.

First the video.

(show video)

What will happen in today's meeting?

A short video on:

- Vista's environmental protection and safety and health efforts
- CMA's Responsible Care Program

What you can do to make Responsible Care a part of our daily work practice

You'll get:

- A copy of Vista's environmental policy
- An opportunity to ask questions
- Opportunity to give feedback on how we're doing

VVV 000011061

Okay, any questions so far?

(answer ones that seem pertinent,
ask that others be held if later
discussion covers them)

First, let me cover some of the
items in the video one more time, to
make sure we all understand one
another.

By the way, when I talk about
environmental protection, I'm not
only talking about protecting our
surroundings.

I'm talking about the health and
safety of all of us at Vista and the
health and safety of the people in
the communities where Vista does
business.

What do we mean by environment?

Not only our surroundings
Also all employees' health and safety
And the health and safety of people in
surrounding communities

VVV 000011062

As part of the Responsible Care Program, Vista, and other chemical companies across the nation, will be:

--Developing codes of management practices aimed at improving our performance in protecting the environment, our employees and our plant neighbors.

--We'll be establishing public advisory panels to keep us informed of the public's concerns.

--We'll be measuring quantitatively the company's performance against the codes we develop.

--And we'll be sharing our experiences with other companies so we can learn from each other.

Responsible Care

What Industry Is Doing

- Developing codes of management practices
- Establishing public advisory panels
- Measuring company performance
- Sharing experiences with others

VVV 000011063

Now for the high points of what Responsible Care means to Vista.

To Vista it means the company recognizes the responsibility it has to all employees, the surrounding communities, customers, carriers, contractors and government agencies to conduct our business activities according to environmental principles.

To our plants, it means reducing the chances of emergency chemical releases to the environment. It also means making sure that our operations are in full compliance with Vista policy as well as government permit limitations and regulatory requirements.

To you, the employees, it means a lot.

For R&D, it means investigating how each new or existing product can be made, used, handled and disposed of while protecting employee safety, public health and the environment.

What does Responsible Care mean?

- To conduct our business activities according to a host of environmental principles
- To reduce chemical releases
- To comply with Vista policy, government permits, regulatory requirements
- To investigate how products can be made, used, handled and disposed of while protecting employee safety, public health and the environment
- To make safety, health, environmental control and waste minimization part of process and facility design, construction and operation
- To be aware of and using environmentally sound, safe work practices

For Vista engineers and researchers, it means making safety, health, environmental control and waste minimization an early and important part of process and facility design, construction and operation.

For all employees, it means being aware of and using environmentally sound, safe work practices.

And we have a responsibility to keep our communities informed of our environmental activities and to reduce the risk to which they are exposed.

Here are some examples from around the company about how Responsible Care is changing the way we do business.

For example, there's a project team working on guidelines defining the level of protection required in the construction or updating of equipment.

Here's another. A process has been developed to make sure new products are developed in a manner that assures compliance with all laws and regulations, and consideration is given to product liability concerns.

Another example is the corporate environmental audit program for our plants which checks our compliance with laws and regulations, and tries to find problems before they occur.

One other example is a group formed in R&D to explore and develop environmental control technologies, and ways to cut down on the production of waste during the production of our products.

Across the company

Environmental Engineering Guidelines Team
New Product Development/Product Liability
Process
Environmental Audits
R&D Environmental Technological Group

VVV 000011065

(Make up a slide showing examples of efforts at your own plant and talk about them. These might include:

- waste minimization projects
- voluntary emission reduction
- work with the community to cut down on their risks
- efforts to cut employee exposure to hazardous chemicals.)

At our facility

VVV 000011066

To help each of you understand more clearly how important protecting the environment is, Vista has adopted and the board of directors has approved an Environmental Protection policy.

You'll see it hanging on the wall in some of our offices.

But I want to give each of you a copy of the policy now.

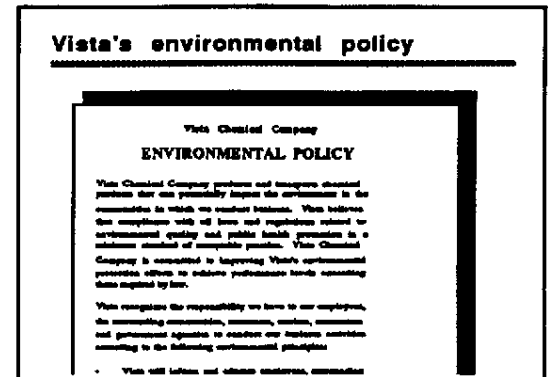
(Pass out the policy)

Now lets read through it and see what it has to say.

(read policy, comment on it, answer questions)

(Conclude discussion with the following)

If each of you takes this policy seriously and makes it part of your work every day, Vista will succeed in its efforts to protect the environment, your safety and health, and the safety and health of those in the communities in which we operate.



VVV 000011067

Now, before you go, I'd like to ask you for some more input on Vista's efforts to protect the environment.

I'm going to pass out another card.

We'd like you to take a few minutes and pick three (3) things that concern or worry you the most about Vista's efforts to protect the environment, about our efforts to protect your health and safety, and our efforts to protect the health and safety of the communities around our plants.

It may be things you think we should do that we're not doing. Or it might be something we're doing that you think we ought to stop or change.

It can be something that's been on your mind for a while, or something that you thought of during the presentation.

Once you've thought of something, list it on the card. If you can only think of one thing, put it down. If you need more cards because you run out of space, I'll give you another.

And if you need help, please ask. We really do need your help and information.

Please let us know how we're doing

Take a few minutes and pick three (3) things that concern or worry you the most about Vista's efforts to protect the environment, to protect your health and safety, and the health and safety of the communities around our plants.

Then list the three things below. If you need help, ask

1. _____

2. _____

3. _____

(Don't suggest specific things that they might use. Please avoid this. People who have no ideas will be influenced by your suggestion, and we'll find it coming back to us 4-5 times.)

VVV 000011068

Pass out the cards

Then put up this slide.

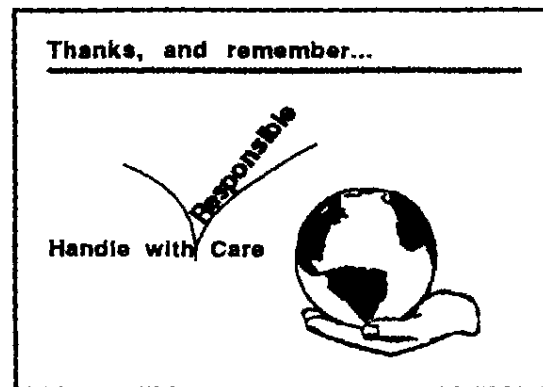
After everyone seems to be finishing up, put up this slide and say ...)

I want to thank you again for listening, and your input. You'll be hearing more about the feedback you gave us.

And you'll certainly hear more about Responsible Care. The CMA is planning to start a nation-wide advertising campaign very soon.

When you've finished your cards, your free to go.

Remember, let's do our jobs with Responsible Care.



VVV 000011069

Protecting the Environment...

VVV 000011070

The air, water and land

And the health and safety of:

- **Employees**
- **Plant neighbors**
- **The community**



VVV 000011071

Before we start, take just a few moments to fill out this card.

Before we start, take just a few moments to fill out this card.

Before we start, take just a few moments to fill out this card.

**Please circle
only one
number per
question.**

**Please circle
only one
number per
question.**

**Please circle
only one
number per
question.**

**Please circle
only one
number per
question.**

Don't forget the back of the card!!!

VVV 000011072

Please circle one answer for each question

Age:

Under 25 25-34 35-44 45-54 Over 55

Sex:

Male Female

Length of Service (years):

0-5 6-10 11-15 16-20 21-25 26+

Work classification:

Salaried Hourly

Work location_____

Why are we here?

Talk about Vista's concern for the environment

Vista produces, transports chemicals that can impact the environment in the communities where we live and work

The Company is committed to improving its environmental protection efforts

New environmental policy

Support of a new chemical industry initiative known as Responsible Care

What will happen in today's meeting?

A short video on:

- **Vista's environmental protection and safety and health efforts**
- **CMA's Responsible Care Program**

What you can do to make Responsible Care a part of our daily work practice

You'll get:

- **A copy of Vista's environmental policy**
- **An opportunity to ask questions**
- **Opportunity to give feedback on how we're doing**

What do we mean by environment?

Not only our surroundings

Also all employees' health and safety

**And the health and safety of people in
surrounding communities**

Responsible Care

What Industry is Doing

- **Developing codes of management practices**
- **Establishing public advisory panels**
- **Measuring company performance**
- **Sharing experiences with others**

What does Responsible Care mean?

- **To conduct our business activities according to a host of environmental principles**
- **To reduce chemical releases**
- **To comply with Vista policy, government permits, regulatory requirements**
- **To investigate how products can be made, used, handled and disposed of while protecting employee safety, public health and the environment**
- **To make safety, health, environmental control and waste minimization part of process and facility design, construction and operation**
- **To be aware of and using environmentally sound, safe work practices**

Across the company

Environmental Engineering Guidelines Team

**New Product Development/Product Liability
Process**

Environmental Audits

R&D Environmental Technological Group

At our facility

VVV 000011079

Vista's environmental policy

VVW 000011080

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

Please let us know how we're doing

VWV 000011081

Take a few minutes and pick three (3) things that concern or worry you the most about Vista's efforts to protect the environment, to protect your health and safety, and the health and safety of the communities around our plants.

Then list the three things below. If you need help, ask:

1. _____

2. _____

3. _____

Thanks, and remember...

VVV 000011082

Handle with Care

Responsible



Executive Alert

January 23, 1990

BOARD APPROVES NATIONAL ADVERTISING EFFORT TO ANNOUNCE RESPONSIBLE CARE COMMITMENT PRIOR TO EARTH DAY

TO EXECUTIVE CONTACTS OF CMA MEMBER COMPANIES

Dear Executive Contact:

At the recommendation of its Public Perception Committee, CMA's Board of Directors has approved a one-time advertising effort to publicly introduce Responsible Care before Earth Day, April 22, 1990.

The double page advertisement will appear in the national editions of four newspapers (USA Today, Wall Street Journal, New York Times and Christian Science Monitor), seven major regional newspapers (LA Times, Sacramento Bee, Chicago Tribune, Houston Chronicle, Baton Rouge Advocate, Newark Star Ledger and Washington Post), four national magazines (Time, U.S. News and World Report, People and Business Week), four trade magazines (Chemical Processing, Chemical and Engineering News, Chemical Engineering and Chemical Week) and three specialty magazines (Smithsonian, National Geographic and Natural History).

The advertisements will appear in the first three weeks of April. They will feature the names of all CMA members who have signed the Responsible Care principles. Funding for the effort (\$2.9 million) will be taken from CMA reserves.

Several considerations have convinced the Board that it is important to communicate now about Responsible Care.

- o CMA's Public Advisory Panel has unanimously advised the association to tell the public sooner rather than later. They are convinced it is more credible to say what one is going to do, then do it, than to try to claim credit after the fact.



CHEMICAL
MANUFACTURERS
ASSOCIATION

2501 M Street, NW
Washington, DC 20037

202-887-1100
Telex 89617 (CMA WSH)

VVV 000011083

- The CERES (Valdez) Principles are being brought forward as a basis to judge a company's commitment to ethical health, safety and environmental management practices. It is important that employees, customers, neighbors, shareholders and the general public know that the chemical industry has been listening closely to the public and is responding forcefully and positively with its own long term initiative to improve performance.
- The 20th anniversary of Earth Day will assure that many members of the public are going to be especially sensitive to how members of the business community respond to health, safety and environmental challenges. Our industry's commitment will be seen and discussed.

A draft of the proposed double page advertisement is attached as an example. Work is not complete. Messages have been tested with one focus group and three more test groups are scheduled. The approach indicated in the attached ad received the most positive reaction from the first group.

Should members wish to consider placing and paying for the same advertisement in a plant community or city not in the CMA media schedule, advertising mechanicals will be made available. Inquiries already indicate several companies are planning to place the ads in plant communities. We expect materials to be ready by the second week in March.

Actions to take before Earth Day.

It will be important that employees of the industry are not blindsided by the advertisements they will be seeing about Responsible Care. It is not necessary that all facilities be able to demonstrate specific activities related to the initiative (although those already involved in the five-year old voluntary CAER program will have something to discuss). But employees and shareholders should understand what Responsible Care is and the commitment their company has made to carry out the initiative.

IMPORTANT: As noted earlier, the advertisements planned prior to Earth Day will feature the names of all CMA member companies. We believe this sends the strongest possible signal about our collective and individual commitment. However, if you prefer not to have your company name listed please let me know in writing by no later than February 15.

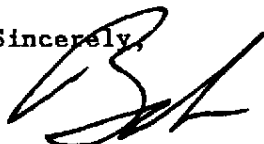
At the next Board meeting, April 6, a longer term commitment to an advertising program will be considered. The Board's Public Perception Committee has recommended a five year effort which, if approved, would call for significant additional funding from the membership. The Board has asked for a detailed proposal to include a plan for paying for a campaign. As further information is developed it will be sent to you.

Executive Alert
January 23, 1990
Page 3

If you would like someone from your staff to be directly involved in the development, planning and implementation stages of this proposal please let me or Jon Holtzman know.

CMA Contacts: Jon Holtzman, Vice President-Communications
(202)887-1200 and Dr. Lori Ramonas, Director-Responsible Care
(202)887-1264.

Sincerely,

A handwritten signature in black ink, appearing to be 'RA Roland', written over the word 'Sincerely,'.

Robert A. Roland
President

Attachments

VVV 000011085

Responsible Care: Membership has its obligations.

170 leading companies are saying "We're responsible."

It's no secret that a lot of people are unhappy with chemical companies.

This despite the fact that chemicals have become necessities of modern living. In fact, it's estimated that over 60% of today's products could not be manufactured without chemicals.

Today, there are hundreds of chemical manufacturers in the United States, and thousands of chemical products that help your family enjoy the benefits of progress.

Still, the quality of your life is measured by more than progress. You have a right to expect the highest possible standards of operation from such an important industry.

That's why the member companies of the Chemical Manufacturers Association have joined together in establishing the guiding principles of the Responsible Care Initiative:

- To recognize and respond to community concerns about chemicals and our operations.
- To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.
- To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes.
- To report promptly to officials, employees, customers and the public, information on chemical-related health and environmental hazards and to recommend protective measures.
- To counsel customers on the safe use, transportation and disposal of chemical products.
- To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.
- To extend knowledge by conducting or supporting research on health, safety and environmental effects of our products, processes and waste materials.
- To work with others to resolve problems created by past handling and disposal of hazardous substances.
- To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.
- To promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

The CMA has already been a prime mover in implementing Title III — your Right To Know about what chemicals are being produced and used in your neighborhood. Now, we're committing our resources to do more.

If you live near a chemical company, work with them to be an active participant in Responsible Care.

The world is a fragile place. The problems are big. We all have to work together to protect it.

For a free brochure with more information on the Responsible Care Initiative, write today: CMA Responsible Care, Dept. 001, Box 7777, Washington, DC 00000.

VVV 000011087

Interoffice
Communication

TO: Distribution

~~TGS: JCL: BHT: NRE: AJO: RF~~

XF: Dask

FROM: T. G. Grumbles
DATE: February 15, 1990

VISTA

SUBJ: RESPONSIBLE CARE CODE OF MANAGEMENT PRACTICE: PROCESS
SAFETY

The attached draft code is for review and comment. Please have the appropriate person or persons review and return comments to me by March 16.

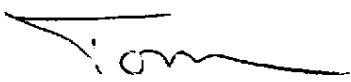
This Code is for process safety. It should be noted that references to safety performance or auditing are referring to process safety not occupational safety and health. These issues will be addressed in the future.

Based on the scope of this Code, it is not clear to me who should review at the plant locations. Also, some of the aspects of the Code may be a corporate engineering function. Based on this, I am sending the draft code to you to determine who should review it at your location. Please let me know who will be reviewing it at your location.

There is a response form with 7 specific questions to assist in your review. This can be completed if you choose or free form comments can be submitted. The self-evaluation form is not to be completed at this time, but is provided for review in terms of content and form.

Also, an open forum is being held on March 1 to review this draft Code. A tentative agenda is attached. Please let me know if someone from your location is interested in attending.

Once again, I need you to tell me who is reviewing this at your location, and I need comments by March 16 so I can develop a consolidated Vista response to CMA.


T. G. Grumbles

dlj
.1007
Attachment

Distribution: 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-LCVM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

V. Messick, G. Inbody, R. T. Ferrell

VVV 000011088

R. Poe-Austin