

Vista Chemical Company

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TGG: JCL: FGJ: AC: AJO: RF

XF: 283.5

VISTA

June 18, 1991

Bhavana Shah
Quality Assurance Petrolite Corporation
369 Corporation
St. Louis, Missouri 63119

Dear Bhavana:

This letter acknowledges that the Vista products listed below are on the USEPA TSCA inventory.

Vista ALFOL®+ Alcohol
Vista ALFOL®810 Alcohol

Sincerely,



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

dlj

VVV 000006487

TGG: ~~40~~CL: FGJ: AC: AJO: RF
XF: 5

TO: John Farrier

FROM: T. G. Grumbles

DATE: June 18, 1991

Interoffice
Communication

SUBJ: EX-PLANT CTIRP PLAN COMMENTS

VISTA

Below are comments on your proposed ex-plant CTIRP program.

I believe we need a separate set of procedures for the ex-plant events similar to what you propose, but I'm not sure if we should fold it into the existing manual, or have a separate one. One approach would be to have one manual with distinct sections for each plan.

I think we have to utilize outside contractors for ex-plant response based on the potential logistics issues. It seems we can analyze our current business and determine the areas of concentrated activities and/or highest risks to define how to utilize the contractors.

I think we have to consider manufacturing responding to ex-plant events, but not as a primary source of response. If a plant can respond quicker than a contractor in a certain circumstance, then they should be asked. There are some issues to address here, but I think it's feasible.

The "Shipment Scenarios" page is not clear to me. I need help understanding it. It may be a format problem but it confuses me.

I think the manufacturing involvement issue needs to be discussed before the process flow can be finalized. At this point, I'm confused by the area I've circled on the attached chart.

Hopefully, we can discuss this at a CTIRP Management Committee meeting or by conference call.



T. G. Grumbles

dlj

Attachment

VVV 000006488

INCIDENT IS REPORTED TO VISTA

REPORTED
BY
CHEMTREC

REPORTED
BY
CARRIER

REPORTED
BY
OTHER

VISTA-LCCP
MAIN GATE

NOTIFY
CTIRP
MNGR.
(MFG)

EXPLANT
INCIDENT
?

YES

HOU-EXPLANT
CTIRP
COORDINATOR

CONTACT PERSON
IN CHARGE AT
SCENE OR CARRIER
SAFETY REP.

CONTACT
CHEMNET
IF S.C.D.I.

HOUSTON
COORDINATOR
ACTS AS VISTA
CONTACT AND
FOLLOWS-UP

VISTA
AID
NEEDED
?

YES

CONTACT
MNGR. S&T

HOUSTON CTIRP
COORDINATOR
REQUESTS
PROD. AREA
MFG.
ASSISTANCE

YES

SHOULD
MGF. CTIRP
RESPOND
?

NO

HOU-EX-PLANT
CTIRP
COORDINATOR
INITIATES
RESPONSE
SEE NOTES
ABOVE

HOU-CTIRP
MITIGATES
INCIDENT ON
THE SCENE

NO

CONTACT
CONTRACTOR
?

YES

HOU-CTIRP
CALLS REGIONAL
CONTRACTOR OR
CHEMNET
RESP. ER

CTIRP.DIA
CARRIER

MANAGER - S&T CONTACTS THE
APPROPRIATE MANAGEMENT PERSONNEL
AS FOLLOWS:
MANAGER - ENVIRONMENTAL
MANAGER - PUBLIC RELATIONS
GENERAL MANAGER - MANUFACTURING
V.P. - SUPPLY & DISTRIBUTION
APPROPRIATE SENIOR MANAGEMENT

HOUSTON EX-PLANT-CTIRP INCIDENT RESPONSE FLOW DIAGRAM

INITIATING THE RESPONSE

TO INITIATE THE RESPONSE, THE HOU-EXPLANT COORDINATOR:
ACTS AS THE VISTA REP. ON THE SCENE
KEEPS S&T MANAGEMENT TEAM INFORMED
OBTAINS LEGAL AND ENVIRONMENTAL ASSISTANCE AS NEEDED
PREPARES REPORTS AFTER THE INCIDENT
INFORMS APPROPRIATE GOVERNMENT AGENCIES SUCH AS:
-THE NATIONAL RESPONSE CENTER
-OTHER FEDERAL, STATE & LOCAL AGENCIES AS REQUIRED