~~TGG:~~ JCL: BRT: MJH: AJO: RF

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VISTA

Interoffice Communication

TO: Distribution

FROM: T. G. Grumbles
DATE: April 24, 1990

SUBJ: RESPONSE TO LEVER BROTHERS LIMITED ENVIRONMENTAL EXPENDITURES QUESTION

Below is a draft of the answer for question No. 7 on the Lever questionnaire. I talked to Elliot Vogelfanger about the answer and he is comfortable with it.

7. Has your company invested in environmental programs or equipment? Yes

   If yes, please list along with dates and cost.

It is difficult to list all the individual projects Vista has completed in the near past. However, from 1985 to 1988 Vista spent approximately 4.5 million a year in capital to upgrade environmental facilities and assure compliance with regulation.

In 1989 environmental expenditures began to increase in response to increasingly stringent regulations in the hazardous and solid waste, and stormwater and wastewater areas.

Over the next 5 years, we estimate average capital expenditures of 8-12 million per year with a higher than average outlay in 1990 and 1991. These expenditures will allow us to comply with current and anticipated regulations in the near term and allow more cost effective compliance with anticipated regulations in the future.

Project designs now include a waste minimization/source reduction philosophy and a predetermined standards of environmental protection that generally exceeds current regulatory requirements.

Please give me any comments by May 3 so I can get this out to Lever before leaving the office for 2 weeks.

Tom

T. G. Grumbles

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