

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079-2990
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224-9029
Fax (713) 588-3236

March 18, 1991

TO: ~~JEC~~ ERT: MJH: AJO: RF
XF: 27.55

VISTA

Ms. Ann Mason
Waste and Release Reduction Programs
CMA
2501 M Street N. W.
Washington, D. C. 20037

Dear Ann:

Following are Vista Chemical's comments on the additions to the Pollution Prevention Code of Management Practices. Also, attached to this memo are the additional comment pages requested by CMA.

Code Element 11: Vista suggests adding the words "as appropriate" or "when identified" to the end of the principle. This would clarify the fact that there may not always be improvements that are needed or feasible.

Code Element 12: No comments

Code Element 13: This code element should have some wording that identifies the need to implement controls relevant to the risk involved. In other words, the potential impact of the chemical should be considered when designing systems.

Also, the words "of potential groundwater releases" should be added after "early detection of" to clarify that this provision is meant to detect prior to contaminants entering groundwater. In other words groundwater wells are not a good detection system.

Code Element 14: This element must have some words to clarify the need for and ability of companies to take proactive actions in all cases. Unfortunately, the ability to act is often limited by the intervention of governmental agencies, in terms of remedy selection and clean-up standards. It should be clear that companies are not expected to proceed without appropriate governmental approvals, etc. to progress in this code element.

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Some of the issues identified above may be covered in additions to the implementation manual, but anything that can be done to clarify intent in the code elements should be done.

Sincerely,



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

dlj

Attachment

cc: PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. Pavao-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, R. A. Conrad-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

ENVIRONMENTAL COORDINATORS

F. G. Jeanson-Aber, D. L. Mahler-Balt, G. D. Williams-Blane, Matt Tonkovich-Hmd, M. G. Hayes, G. L. Foshee, J. L. Johnson, Julie Bozich, Diane Johnson-LCCP, Tony Salah-LCLAB, D. R. Booth-LCVCM, Joyce Callen-Okc, G. C. Lipps-Prem, R. B. Martin, J. R. Roheim-Austin, R. B. Quay

T. H. Huffman, R. D. Gamblin

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