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FROM: T. G. Grumbles

DATE: August 8, 1988

Interoffice
Communication

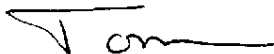
SUBJ: ENVIRONMENTAL MANPOWER NEEDS ASSESSMENT TEAM MEETING

VISTA

I've only received questions from Warner. His and mine are attached. Please review before the meeting.

I'll have a facilitator at our meeting. I've also asked Tom O'Brien, Quality Coordinator for Marketing, to come for a while to consult with us on survey methods and pitfalls. I'll have a final agenda at the meeting.

See you Wednesday at 10:00 a.m.



T. G. Grumbles

dlj
.416

Attachment

Distribution:

M. G. Hayes-LCCP (fax)
J. P. Warner-LCLAB (fax)
Doug Michels-Houston

VVV 000008643

ENVIRONMENTAL AUDITS

Environmental audits are one way of determining how well a plant is complying with environmental programs and procedures. Audits can be both formal and informal and can involve non-plant personnel. An audit is a check to see if plant practices are in line with requirements.

1. Does your plant have an audit program?
2. Does your plant have a formal audit program?
3. Who conducts the audit(s)?
4. Do you feel that the audit program is of sufficient scope to detect problem areas in plant practices?
5. Do you feel that you should do (more, less or same) amount of auditing?
6. Do you need additional auditing resources? If yes, please explain.

7. Briefly, please describe your audit program.

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REPORTS

1. Are routine reports submitted per regulatory requirements?
2. Are non-routine reports (leads, spills, bypasses, etc.) reported per regulatory requirements.
3. Who completes and submits routine reports? Do these individuals have sufficient environmental knowledge to detect problems in the reports?
4. Who makes non-routine reports?
5. Is there someone at the plant at all times that has the knowledge and training to make non-routine reports? If not, how are such reports handled?
6. Are there changes that need to be made to your reporting procedures?

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ENVIRONMENTAL TRAINING

1. Do you conduct the environmental training required by regulations?

2. Please list your training programs.

3. Do you test individuals receiving training to determine level of comprehension?

4. Is your training effective?

5. Who conducts the training?

6. Do both hourly and management receive environmental training?

7. What additional training needs to be done?

8. Are these additional training resources that are needed?
If yes, please detail.

9. Briefly, please describe your training program.

MEETING PERMIT REQUIREMENTS

1. Do you have problems meeting existing permit requirements?
2. Do Operations and Maintenance supervisors understand the limitations placed upon their activities by your permits?
3. Do Operations and Maintenance field personnel understand the limitations placed upon their activities by your permits?
4. Do you audit your compliance with your permits?

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ENVIRONMENTAL MANPOWER NEEDS ASSESSMENT TEAM
SURVEY QUESTIONS

CONOCO APA

1. Does your plant have current ongoing APA retained environmental liability issues?
2. Are you or plant management comfortable with your knowledge of the APA language, scope and requirements?
3. Have you had APA problems such as missing a notice letter requirement or involving Conoco when necessary?

INCIDENT RESPONSE/PREVENTION

1. Have you evaluated your processes for release potential to impact off-site areas?
2. Have you done any emergency release modeling?
3. Have you done any release mitigation work?
4. Who does the release reporting at the plant?
5. Does the plant have a formal in-house notification procedure for release events?
6. Does the plant do post release reviews?
 - a) Who participates?
 - b) What is done with the results?

REGULATORY TRACKING

1. How does the plant stay aware of federal regulatory developments?
2. How does the plant stay aware of state regulatory developments?
3. Who is responsible for regulatory information dissemination?
4. How does the plant address new regulatory needs?
5. Do you receive enough information to assure compliance with regulations?

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