

Interoffice
Communication

TO: Distribution

FROM: T. G. Grumbles

DATE: September 23, 1991

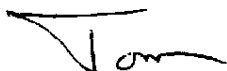
SUBJ: RESPONSIBLE CARE DISTRIBUTION CODE OF MANAGEMENT PRACTICE
SELF-EVALUATION

VISTA

Attached for your information and review is our scorecard for the subject Code. As you will see, this scorecard is significantly different from others to date. As previously discussed in the self-evaluation guidance and request, this is a result of multiple locations beyond the plant sites being considered as reporting locations. These include functional groups in S&T and for some elements, individual ex-plant shipping and handling locations.

Also attached are the following:

1. Explanation of the reporting locations for each element (Attachment 1).
2. Specific changes made in scorecards submitted to Houston. Some changes were made based on discussions with the plants and clarification of applicability. It is important to note any specific changes made at your location as this was our first, and therefore "baseline" self-assessment (Attachment 2).



T. G. Grumbles

dlj

Attachment

VVV 000007823



Responsible Care:®
A Public Commitment

CHEMICAL MANUFACTURERS ASSOCIATION

MEMBER SELF-EVALUATION FORM

**DISTRIBUTION CODE
OF MANAGEMENT PRACTICES**

Member Company

Name: Vista Chemical Company

Responsible Care Coordinator

Name: Thomas G. Grumbles

Address: P.O. Box 19029

Houston, TX 77224

Telephone (713) 588-3445

VVV 000007824

MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
Risk Management Practices						
1.1 Regular evaluations of chemical distribution risks which consider the hazards of the material, the likelihood of accidents/incidents and the potential for human and environmental exposure from release of the material over the route of transport.		100%				
1.2 Implementation of chemical distribution risk reduction measures that are appropriate to the risk level.		100%				
1.3 Internal reporting and investigation of chemical distribution accidents/incidents, and implementation of preventive measures.		100%				
Compliance Review and Training						
2.1 A process for monitoring changes and interpretations of new and existing regulations and industry standards for their applicability to the company's chemical distribution activities, and for implementing those regulations and standards.			50%		50%	
2.2 Training for all affected company employees in the proper implementation of applicable regulations and company requirements.	8.33%	50%	16.67%	8.33%	16.67%	
2.3 A program for providing guidance and information to carriers, distributors and contractors who perform distribution activities for the company on the company's training and compliance requirements for the activities.	1.01%	37.06%	5.08%	23.86%	32.99%	
2.4 Regular reviews of company employee, carrier, distributor and contractor compliance with applicable regulations and company requirements.		38.5%	5.00%	26.50%	30.00%	

VVV 000007825

MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
Carrier Safety						
3.1 A process for qualifying carriers of all modes and types (common, contract, private and customer controlled) that transport chemicals to and from company facilities that emphasizes carrier safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.	.75%	55.22%		34.33%	9.70%	
3.2 Feedback to carriers on their safety performance and suggestions for improvement.	.74%	98.51%		.74%		
Handling and Storage						
4.1 Documented procedures for the selection and use of containers that are appropriate for the chemical being shipped, in compliance with testing and certification requirements, and free of leaks and visible defects.	6.25%	37.50%	25%	6.25%	25%	
4.2 Documented procedures for loading chemicals at company facilities that will reduce emissions to the environment, protect personnel and provide securement of the lading during transit.		50%		20%	30%	
4.3 Documented procedures for unloading chemicals at company facilities that will reduce emissions to the environment, protect personnel, and provide for safe unloading into proper storage facilities.		50%	10%	10%	20%	10%
4.4 Defined criteria for the cleaning and return of tank cars, tank trucks, marine vessels, and returnable/refillable bulk and semi-bulk containers, and for the proper disposal of cleaning residues.		75%	12.5%		12.5%	
4.5 A program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing the company's chemicals.	9.09%	72.73%			18.18%	

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MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
4.6 A process for selecting distributors and other facilities that store or handle the company's chemicals in transit that emphasizes safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.		66.67%			33.33%	
4.7 Feedback to distributors and operators of other facilities that store or handle chemicals in transit on their safety performance and suggestions for improvement.		66.67%			33.33%	
Emergency Preparedness						
5.1 A process for responding to chemical distribution accidents/incidents involving the company's chemicals.			9.09%		90.91%	
5.2 Documented procedures for making information about the company's chemicals in distribution available to response agencies.		61.54%			38.46%	
5.3 A program for making facilities and/or training materials available to emergency response agencies.	30%	30%	10%	10%	20%	
5.4 Dialogue with state and local emergency planning organizations on the distribution and hazards of the company's chemicals to improve community preparedness to respond to chemical distribution emergencies.	10%	50%		20%	20%	
5.5 Dialogue with the public on their concerns about chemical distribution safety, actions taken by the industry and the company to improve the safety of chemical distribution, and the effectiveness of emergency preparedness and emergency response assistance.	50%	40%		10%		

VVV 000007827

ATTACHMENT 1

Reporting "Facilities" for Distribution Code Self-Evaluation

Risk Management Practices

Element 1.1 - 1

This was considered to be a corporate function. One location was considered.

Element 1.2 - 1

This was considered to be a corporate function. One location was considered.

Element 1.3 - 1

This was considered to be a corporate function. One location was considered.

COMPLIANCE REVIEW AND TRAINING

Element 2.1 - 2

Reporting locations considered were:

Corporate Environmental
Supply & Transportation

Element 2.2 - 12

Reporting locations considered were:

Core Vista Locations
Headquarters
Transports

Element 2.3 - 202

Core Vista Locations	International Operations
Transports	Rail Operations
Barge Operations	Motor Carrier Group
Rail, Freight and Carriers	Motor Carrier Group
	Explant Operations Locations

Element 2.4 - 199

Reporting locations considered were:

Core Vista Locations	Rail Operations
Transports	Explant Operations Locations
Barge Operations	Motor Carrier Group
Rail, Freight and Carriers	International Operations

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CARRIER SAFETY

Element 3.1 -134

Reporting locations considered:

Core Vista Locations	Motor Carrier Group
Barge Operations	Rail Freight and Carriers
International Operations	

Element 3.2 - 134

Reporting locations considered:

Core Vista Locations	Motor Carrier Group
Barge Operations	Rail Freight and Carriers
International Operations	

Handling and Storage

Element 4.1 - 16

Reporting locations considered:

Core Vista Locations	Barge Operations (Houston)
International Operations (Houston)	Rail Operations (Houston)
Transports (Houston)	ExPOG (Houston)
Motor Carrier Group (Houston)	

In this element the score is based on the functional groups having procedures, versus all locations managed by those groups as in 3.1 and 3.2.

Element 4.2 - 10

Reporting locations considered:

Core Vista Locations

Element 4.3 - 10

Reporting locations considered:

Core Vista Locations

Element 4.4 - 16

Reporting locations considered:

Core Vista Locations	Barge Operations (Houston)
International Operations (Houston)	Rail Operations (Houston)
Transports (Houston)	ExPOG (Houston)
Motor Carrier Group (Houston)	

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Element 4.5 - 11

Reporting locations considered:

Core Vista Locations	ExPOG
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Element 4.6 - 3

Reporting locations considered:

Rail Operations Transports	ExPOG
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Element 4.7 - 3

Reporting locations considered:

Rail Operations Transports	ExPOG
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EMERGENCY PREPAREDNESS

Element 5.1 - 11

Reporting locations considered:

Core Vista Locations
S&T (Houston)

Element 5.2 - 13

Reporting locations considered:

Core Vista Locations	ExPOG
Rail Operations	Transports

Element 5.3 - 10

Reporting locations considered:

Core Vista Locations

Element 5.4 - 10

Reporting locations considered:

Core Vista Locations

Element 5.5 - 10

Reporting locations considered:

Core Vista Locations

VVV 000007830

For the self-evaluation Core Vista locations, include all plants and R&D. The following number of locations were considered "active" for the non-plant locations:

- ExPOG - 52 locations
- Motor Carrier Group - 58 carriers
- Rail Operations - 9 locations (shops, etc.)
- Vista Transports - 2 terminals
- Barge Operations - 4 carriers
- International Operations - 47 locations/companies/carriers
- Rail Freight and Contracts - 15 rail carriers

It is recognized these numbers will change but it is the percentage of locations at an implementation stage that is reported. Our goal is to increase percentages of total locations at a specific stage.

A detailed scorecard specifying the numbers used to obtain the percentages in the scorecard follows this page.

VVV 000007831

MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
Risk Management Practices						
1.1 Regular evaluations of chemical distribution risks which consider the hazards of the material, the likelihood of accidents/incidents and the potential for human and environmental exposure from release of the material over the route of transport.		100%				
1.2 Implementation of chemical distribution risk reduction measures that are appropriate to the risk level.		100%				
1.3 Internal reporting and investigation of chemical distribution accidents/incidents, and implementation of preventive measures.		100%				
Compliance Review and Training						
2.1 A process for monitoring changes and interpretations of new and existing regulations and industry standards for their applicability to the company's chemical distribution activities, and for implementing those regulations and standards.			50%		50%	
2.2 Training for all affected company employees in the proper implementation of applicable regulations and company requirements.	BLN	LCVCM ABD LCCP PREM LCLAB OKC	AUST HAMM	BALT	TRANSP HDQ	
2.3 A program for providing guidance and information to carriers, distributors and contractors who perform distribution activities for the company on the company's training and compliance requirements for the activities.	PREM BLN	ABD LCCP LCLAB LCVCM OKC TRANSP - 2 BARGE - 4 RF&C - 15 INTOPS - 47	HAMM RAILOPS - 9	AUST BALT MCG - 45	EXPOG - 52 MCG - 13	
2.4 Regular reviews of company employee, carrier, distributor and contractor compliance with applicable regulations and company requirements.		AUSTIN ABD OKC BALT BLN LCCP LCLAB LCVCM PREM TRANSP - 2 BARGE - 4 RF&C - 15 INTOPS - 47	HAMM RAILOPS - 9	EXPOPS - 8 MCG - 45	EXPOPS - 45 TRANSP - 2 MCG - 13	

VVV 000007832

MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
Carrier Safety						
3.1 A process for qualifying carriers of all modes and types (common, contract, private and customer controlled) that transport chemicals to and from company facilities that emphasizes carrier safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.	BLN	LCVCM ABD AUST LCCP PREM LCLAB OKC HAMM BARGE - 4 RF&C - 15 INTOPS - 47		BALT MCG - 45	MCG -13	
3.2 Feedback to carriers on their safety performance and suggestions for improvement.	BLN	PREM LCLAB OKC HAM AUST ABD LCCP LCVCM BARGE - 4 RF&C - 15 INTOPS - 47 MCG - 58		BALT		
Handling and Storage						
4.1 Documented procedures for the selection and use of containers that are appropriate for the chemical being shipped, in compliance with testing and certification requirements, and free of leaks and visible defects.	HAMM	ABD LCCP BLN LCLAB BARGE INTOPS	PREM OKC TRANSP RAILOPS	BALT	LCVCM AUST EXPOG MCG	
4.2 Documented procedures for loading chemicals at company facilities that will reduce emissions to the environment, protect personnel and provide securement of the lading during transit.		ABD LCCP BLN LCLAB AUST		OKC BALT	LCVCM PREM HAMM	
4.3 Documented procedures for unloading chemicals at company facilities that will reduce emissions to the environment, protect personnel, and provide for safe unloading into proper storage facilities.		ABD LCCP BLN LCLAB AUST	HAMM	BALT	LCVCM OKC	PREM
4.4 Defined criteria for the cleaning and return of tank cars, tank trucks, marine vessels, and returnable/refillable bulk and semi-bulk containers, and for the proper disposal of cleaning residues.		AUST LCVCM ABD LCCP PREM BLN LCLAB OKC MCG EXPOG BARGE INTOPS	BALT RAILOPS		HAMM TRANSP	

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MEMBER SELF-EVALUATION FORM

	I	II	III	IV	V	VI
4.5 A program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing the company's chemicals.	HAMM	ABD BALT BLN LCCP LCLAB LCVCM OKC PREM			AUST EXPOG	
4.6 A process for selecting distributors and other facilities that store or handle the company's chemicals in transit that emphasizes safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.		RAILOPS TRANSP			EXPOG	
4.7 Feedback to distributors and operators of other facilities that store or handle chemicals in transit on their safety performance and suggestions for improvement.		RAILOPS TRANSP			EXPOG	
Emergency Preparedness						
5.1 A process for responding to chemical distribution accidents/incidents involving the company's chemicals.			HOUSTON (S&T)		AUST ABD BALT BLN LCCP LCLAB LCVCM HAMM OKC PREM	
5.2 Documented procedures for making information about the company's chemicals in distribution available to response agencies.		AUST ABD LCCP LCLAB OKC RAILOPS EXOPG TRANS			LCVCM PREM BLN BALT HAMM	
5.3 A program for making facilities and/or training materials available to emergency response agencies.	LCCP PREM BLN	LCVCM LCLAB HAMM	AUST	ABD	OKC BALT	
5.4 Dialogue with state and local emergency planning organizations on the distribution and hazards of the company's chemicals to improve community preparedness to respond to chemical distribution emergencies.	HAMM	LCVCM LCCP PREM LCLAB AUST		ABD BALT	BLN OKC	
5.5 Dialogue with the public on their concerns about chemical distribution safety, actions taken by the industry and the company to improve the safety of chemical distribution, and the effectiveness of emergency preparedness and emergency response assistance.	ABD LCCP PREM BLN HAMM	LCVCM LCLAB OKC AUST		BALT		

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ATTACHMENT 2

Specific Changes in Scorecards Submitted

In several instances there was some confusion over applicability of code elements to specific locations, or the written guidance given was bad. There may still be some debate over applicability but the following changes were made in individual score cards:

Austin

Austin did not provide a score on multiple elements. The following scores were added.

<u>Element</u>	<u>Stage</u>
2.4	2
3.1	2
4.2	2
4.3	2
4.4	2
5.2	2
5.2	2
5.4	2
5.5	2

Baltimore

<u>Element</u>	<u>Stage</u>
2.4	2
4.5	2

Blane

<u>Element</u>	<u>Stage</u>
2.4	2
4.5	2

Aberdeen

<u>Element</u>	<u>Stage</u>
2.4	2
4.5	2
3.2	2

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LCCP

<u>Element</u>	<u>Stage</u>
2.3	2
2.4	2
3.1	2
3.2	2
4.4	2
4.5	2

LCLAB

<u>Element</u>	<u>Stage</u>
2.4	2
4.5	2

LCVCM

<u>Element</u>	<u>Stage</u>
2.4	2
3.2	2
4.5	2

Hammond

<u>Element</u>	<u>Stage</u>
4.4	5

Okc

<u>Element</u>	<u>Stage</u>
2.4	2
4.4	2
4.5	2

Premiere

<u>Element</u>	<u>Stage</u>
4.5	2

Elements 2.4 and 4.5 were applicable to plants in most cases because plants do contract carrier, etc., business that is managed by S&T.

Please note these changes on the scorecards you submitted as they will serve as our baseline assessment.

VVV 000007836