

TGG: JEL: MMG: AJO: ~~RF~~
XF: Desk

TO: Distribution

FROM: T. G. Grumbles
DATE: March 1, 1989

Interoffice
Communication

SUBJ: VISTA ENVIRONMENTAL POLICY STATEMENT/CMA RESPONSIBLE CARE
PROGRAM REVIEW

VISTA

Attached is an agenda for the subject meeting to be held Wednesday, March 8, 1:00-2:30 in Conference Room 3B.

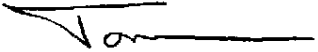
The purpose of the meeting is to introduce the CMA Responsible Care Program, review the draft Vista Environmental Policy Statement and present our communication plan for both. I realize not all of you can attend. The 8th was the best we could do to have the most people available this month. Those who can't be there will be given the opportunity individually to give comments on the attached.

Since the formation of Vista, we have not had a pinpointed company policy statement regarding the corporate environmental philosophy or policy. A draft of the policy statement is attached.

Also, CMA has implemented a new program called Responsible Care. This program requires CMA members to commit to efforts that will result in continuous improvement in 10 program areas. The Responsible Care Principles and a summary description are attached.

We believe that by implementing the Vista Environmental Policy Statement principles we will meet the required obligations of Responsible Care.

Vista has an obligation to communicate the Responsible Care Program in the near future. It would be best to do this in conjunction with the publication of the Vista policy. This would allow us to communicate implementation of Vista principles and programs versus implementation of a CMA program. Implementation of the Policy elements will require Management and resource commitment from all functional areas of the company.


T. G. Grumbles

dlj
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Attachment

Distribution: J. Inbody, R. Gerlach, J. Stoner, J. McCulley,
J. DeBernardi, T. Huffman, G. Draper, D. Kuhn,
B. Larsen, W. B. J. Vogel, D. Andersen, R. Flammer,
V. Weiss, W. L. McClain, N. Frost

cc: J. Ball, R. D. Gamblin, J. Burns, J. Weidner, R. Ferrell

VVV 000006893

AGENDA
WEDNESDAY, MARCH 8, 1989
1:00-2:30
CONFERENCE ROOM 3B

Purpose: 1) Introduce the CMA Responsible Care Program elements and proposed communication plan.

2) Introduce Vista's Draft Environmental Policy Statement

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|----|--|-----|---------|
| 1. | Introduction & Purpose | RDG | 5 Min. |
| 2. | Review of Responsible Care | TGG | 15 Min. |
| | a) Elements | | |
| | b) Vista obligations | | |
| | c) Proposed Communication Plan | | |
| 3. | Present Vista Environmental Policy Statement | TGG | 20 Min. |
| | a) Elements | | |
| | b) Specific impact of each element | | |
| 4. | Discussion | All | 15 Min. |
| 5. | Review Action Items | TGG | 5 Min. |

DRAFT

VISTA CHEMICAL COMPANY ENVIRONMENTAL POLICY

Vista Chemical Company produces and transports chemical products that can potentially impact the environment in communities surrounding our operating facilities. The Company complies with all laws and regulations related to environmental quality and public health protection in all of our activities.

Vista recognizes the responsibility we have to our employees, the surrounding communities, customers, carriers, contractors and government agencies to conduct our business activities according to the following environmental principles:

- Vista will inform and educate employees, surrounding communities, customers, carriers, contractors and government agencies of the health and environmental hazards of the chemicals we make, use and sell. These activities will involve recognizing and responding to community concerns regarding environmental issues.
- Vista will continue to strive to reduce the risk to employees and neighboring publics posed by chemical substances used, produced and transported within our communities.
- Vista will continue to strive to reduce the potential for emergencies involving chemical releases that would impact the environment and surrounding communities.
- Vista will foster and maintain an awareness of and sensitivity to environmental responsibility among our employees through an ongoing internal communication program.
- Vista will maintain an environmental quality assurance program to ensure that operations are in full compliance with Company policies and procedures, governmental permit limitations and regulatory requirements.
- Vista will determine how each new or existing product can be made, used, handled and disposed of with full attention to employee safety, and environmental and public health protection.
- Vista will consider safety and health, environmental control and waste minimization as essential and integral parts of process and facility design and construction.
- Vista will reduce waste generation in all media by pursuing source-control technology, involving employees in waste minimization efforts.
- Vista will participate with the government and other parties in developing responsible laws, regulations and standards to protect employees, surrounding communities and the environment.

February 28, 1989

VVV 000006895

Guiding Principles for

RESPONSIBLE CARE

A Public Commitment

As a member of the Chemical Manufacturers Association, this company is committed to support a continuing effort to improve the industry's responsible management of chemicals. We pledge to manage our business according to these principles:

- To recognize and respond to community concerns about chemicals and our operations.
- To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.
- To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes.
- To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures.
- To counsel customers on the safe use, transportation and disposal of chemical products.
- To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.
- To extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials.
- To work with others to resolve problems created by past handling and disposal of hazardous substances.
- To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.
- To promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

**RESPONSIBLE
CARE**
A Public Commitment

SUMMARY DESCRIPTION

Responsible Care Program Elements

The *Guiding Principles for Responsible Care of Chemicals* is a statement of commitment by each member company to fully support a continuous effort to improve the industry's responsible management of chemicals. Each member company will pledge to operate according to the principles statement and will sign to that effect. This signed statement will be considered an obligation of membership in CMA. These guiding principles are based on CMA's 1983 policy statement on health, safety and the environment and on the Canadian Responsible Care principles. They also incorporate guidance received from member company executive contacts.

Following association adoption of the guiding principles, various CMA committees will begin development of *Codes of Management Practices*. Each set of management practices will focus on a different concern. Impetus for developing an individual Code of Management Practices will come from either an industry belief that there exists a substantive need to take voluntary action or a substantial public concern to which the industry should be responsive, or both. Initially, code packages will be considered for CAER, transportation, release reduction and management, and plant operations. Based upon the implicit obligations of the guiding principles, the Codes of Management Practices will be designed by identifying expected management practices as objectives rather than prescribing any absolute or quantitative standard. Since the codes are intended to serve as objectives, they will complement any existing member company programs or practices that achieve the same goals. Responsible Care will therefore become an integral part of the existing company program, not a replacement or another duplicative overlay. Each Code of Management Practices will be approved by the board after the opportunity for comment by all member companies.

Another important element in the Responsible Care initiative is a *Public Advisory Panel*, which will be composed of a cross-section of environmental, health and safety thought leaders. The panel will be an industry (CMA) effort, not a company responsibility. It will be assembled and moderated by an experienced facilitator working at the association's direction and will serve to assist the industry in identifying and developing programs and actions that are responsive to public concerns and viewed as proactive by key policy groups. Meeting several times a year, the panel will review issues on which CMA requires comment and advice as well as to discuss subjects that panel members believe require industry response. The panel will critique (but not approve) all proposed Codes of Management Practices and is expected to provide early definition of public concerns involving the chemical industry. *Community Advisory Panels* at the local or regional level can serve companies and the industry in a similar manner. They will be called for as a milestone of a "CAER Code of Management Practices" and CMA will offer support to facilitate companies' formation and operation of these local panels.

Effective performance evaluation is a critical element of Responsible Care. *Member Company Self-Evaluations of Management Practices*, as well as compilation of quantitative results, will be necessary to meet three vital objectives. In order to build a collective record of tangible improvement in the responsible management of chemicals, specific management practice codes may call for CMA to collect and maintain *statistical trends* from data that members currently make available to governmental organizations. Details of quantitative trend statistics programs will be defined by task forces developing the respective management practice code package.

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SUMMARY DESCRIPTION (Continued)

Two additional objectives are served by Member Company Self-Evaluations of Management Practices. The first is to provide feedback from the membership on the value and relevance of codes of management practices and on any additional CMA support activities that may be needed. Second, such evaluations, along with quantitative trend data, will build CMA credibility and confidence on behalf of its members in dealing with government, the public and other external groups.

Each management practice code will contain definition of management practice "progress mileposts" that member companies will use to measure and evaluate their performance versus the commitment. Details of the member management practice evaluation program will be developed by a designated work group for the board of directors' consideration and approval. The work group will be requested to define the mechanics of a practical system based on member company self-evaluation of their progress. Evaluations will be coordinated through the member companies' executive contacts and will be designed to maximize the value to companies' efforts to improve their performance.

Due to their varying size and circumstances, member companies will not be expected to be at the same level of performance for each Code of Management Practices at the same time. However, it will be expected that each member company will be able to report continued progress.

To facilitate and support each member company's continual improvement in responsible management of chemicals, **Executive Leadership Groups** will be formed to provide an opportunity for executive contacts to periodically discuss progress and share experiences with each other that have been successful. These regional groups of ten to twenty executive contacts will meet several times a year to review Codes of Management Practices under development, discuss members' progress on existing codes, identify areas where individual companies need assistance from CMA or other companies, and to address other priority industry issues. Understandings developed during these meetings will be reviewed and acted on by the association's officers, executive committee and board of directors.

Endorsement of the Responsible Care initiative will be an **Obligation of Membership** in the association. Each member company's executive contact is expected to make a commitment to Responsible Care by:

- a) signing the Guiding Principles for Responsible Care of Chemicals statement;
- b) communicating the commitment to Responsible Care to employees; and
- c) instructing management to make good-faith efforts to implement the Codes of Management Practices, participate in the self-evaluation process, and meet the expectations of the Responsible Care Program.

A member company's obligation to Responsible Care applies to those segments of the company's operations included in the CMA dues base (CMA Definition of Chemical Sales).

Member companies are also expected to participate in the development of the codes and programs. The Codes of Management Practices are intended to include mileposts that provide a road map for responding to industry priorities and the public's concerns. Member companies are expected to make good-faith efforts to move up the milepost ladder and meet the expectations of the Responsible Care initiative.

In an extreme case, where a member company has consistently not conducted its operations in accordance with the guiding principles and program elements of Responsible Care, association representatives will meet with the member company's executive contact to seek the company's positive involvement in the program.

If this fails to produce a commitment to pursue the objectives of Responsible Care, the executive committee and board could take appropriate actions including the disassociation of the company from membership after due process requirements have been met.

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