

To: Distribution

From: Responsible Care® Steering Team

Date: October 28, 1992

Interoffice  
Communication

Subject: Responsible Care® Practices Definitions

# VISTA

As a special assignment, Rick Quy, Associate Director of Environmental Research, is formulating a long range plan for Vista's adoption of the Responsible Care® Codes of Management Practices. To do this, we need to define what we consider to be "Practice in Place" for each practice of each code. While some definitions may be the same everywhere, others will differ at each Vista site. Accordingly, Responsible Care Coordinators (or others, as appropriate) at each site are asked to compile their respective definitions for the following codes:

|                              |                    |                     |
|------------------------------|--------------------|---------------------|
| <u>Mfg Plants and Austin</u> | <u>S&amp;T</u>     | <u>Corporate HQ</u> |
| ✓ CAER Code                  | Distribution Code* | Distribution Code*  |
| ✓ Pollution Prevention       |                    | Product Stewardship |
| ✓ Employee Health & Safety   |                    |                     |
| ✓ Distribution Code*         |                    |                     |
| ✓ Process Safety Code        |                    |                     |

\*Applicable practices only.

Definitions developed by LCCP for their five codes are attached as examples only. Their definitions may be used "as is" where appropriate, but should be changed where requirements are different.

Please complete your definitions by 25 November 1992 and forward them directly to Rick Quy at R&D with copies to Tom Grumbles, Environmental.

*T. H. Huffman*

T. H. Huffman (BQ)  
Responsible Care® Steering Team

Distribution: Kenny Akins-Aber, Allie Peek-Balt, G. D. Williams-Blane, Jim Pavao-Hmd, Charlie Dutra-LCCP, Joe Ware-LCLAB, Jim Biggart-LCVCM, Harry Garrison-OKC, G. C. Lipps-Prem, R. B. Martin-Austin, J. G. Farrier-S&T, T. G. Grumbles

cc: J. Friend-LCCP, R. Bauer-Balt, R. Seymour-Aber, P. Markey-LCVCM, P. Foote-Prem, R. T. Ferrell-Austin, P. C. Gowan

To: Tom Grumbles

From: C. R. Dutra

Interoffice  
Communication

Date: April 7, 1992

Subject: LCCP Responsible Care Practices

VIST

Enclosed please find LCCP's practices for four CMA Responsible Care Management Codes:

CAER Code  
Distribution Code  
Pollution Prevention Code  
Process Safety Code

These practices were developed by the LCCP Responsible Care Steering Team. The team will be addressing additional code elements as they are developed by CMA.



C. R. Dutra

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Enclosures

cc: JF CWT MGH KLF

To: Responsible Care Steering Team

From: C. R. Dutra

Interoffice  
Communication

Date: April 1, 1992

Subject: LCCP Practices for CAER Code

VIS

Attached as Table I are LCCP's practices for the Community Awareness and Emergency Response Elements of the CMA Responsible CAER Code. The numbering has been updated to reflect CMA's latest designations and includes the new Code Elements 5 and 10 under Community Awareness. The LCCP Responsible Care Steering Team needs to determine LCCP practices for these elements.



C. R. Dutra

mbr

Enclosure

TABLE I

## CAER CODE OF MANAGEMENT PRACTICES

I. COMMUNITY AWARENESS

CA-#1 "An ongoing assessment of employee concerns and questions about the facility."

Practice:

At least annual solicitation/survey of employee concerns followed by analysis of the data. Could be written, focus groups, etc., but key is to do on some frequency and analyze the data.

CA-#2 "Communications training for key facility and company personnel who will communicate with employees and the public concerning safety, health and environmental issues."

Practices:

1. Determine list of employees most likely to communicate on safety, health and environmental items and provide appropriate general communications training.
2. Appropriate communications seminars (such as CMA Risk Communications Workshop) for key individuals involved in communicating with employees and the public to include as a minimum Plant Manager, Plant Superintendent, Director of Environmental Control and Safety Director.

CA-#3 "Education of employees about the facility's emergency response plan and safety, health and environmental programs."

Practices:

1. All employees educated on the emergency plan and the CAER program.
2. Publish an LCCP report at least annually. Include information on safety, health and environmental programs.
3. Issue a SARA 313 report to employees by October 1 of each year.
4. Use existing internal communication methods (*Vista Visions*, *Weekly Visions*, etc.) to frequently supply information on safety, health and environmental programs.

CA-#4 "An ongoing dialogue with employees to respond to their questions and concerns and to involve them in community outreach efforts."

Practices:

1. At least annually, after survey in Code Element 1, hold a meeting to present data from survey/solicitation and respond to questions and answers.
2. Maintain the ESAR program under the Central Safety Committee.
3. Inform employees, in an ongoing program, of significant items being developed in response to responsible care and solicit employee feedback.
4. Encourage a period in each monthly safety meeting to solicit employee concerns.

CA-#5 "A regular evaluation of the effectiveness of the ongoing employee communication efforts."

Practices:

LCCP has not defined practices for this new code element.

CA-#6 "Ongoing assessment of community questions and concerns about the facility."

Practice:

At least an annual solicitation/survey of community concerns about the facility followed by an analysis of the data.

CA-#7 "An outreach program to educate responders, government officials, the media, other businesses and the community about the facility's Emergency Response Program and risks to the community associated with the facility."

Practices:

1. Every year conduct plant tours for at least three groups from the plant's various audiences. Include a presentation on the emergency response program, risks posed by the facility and the safety and health programs.
2. Work with CAER and LEPC to improve public education concerning emergency response.

CA-#8 "A continuing dialogue with local citizens to respond to questions and concerns about safety, health and the environment, and to address other issues of interest to the community."

Practices:

1. Publish an annual LCCP report on safety, health, environment and other appropriate issues. Distribute to appropriate citizens. Advertise availability of the report in local media.
2. Sponsor and participate in the I-10 Citizens Advisory Panel.
3. Develop appropriate responses to concerns determined through Element No. 6.

CA-#9 "A policy of openness that provides convenient ways for interested persons to become familiar with the facility, its operations and products, and its efforts to protect safety, health and the environment."

1. State in our annual report a policy that plant tours and presentations are available at least monthly to everyone (subject to some generic restrictions such as age).
2. Publish and distribute an annual LCCP report on safety, health, environment and other appropriate issues.
3. Maintain a policy of providing timely, cooperative response to media requests.

CA-#10 "A regular evaluation of the effectiveness of the ongoing community communications efforts."

Practice:

LCCP has not defined practices for this new code element.

**II. EMERGENCY RESPONSE**

ER-#1 "An ongoing assessment of potential risks to employees and local communities resulting from accidents or other emergencies."

Practices:

1. Perform or review/update modeling and assessment of environmental and health risks of worst case accidental release scenarios. Scenarios are defined as immediate release of largest vessels in the plant.
2. HAZOP each unit every five years or each significant change and perform a transportation evaluation every five years.

ER-#2

"A current, written facility Emergency Response Plan which addresses, among other things, communications and the recovery needs of the community after an emergency."

Practices:

1. Have a comprehensive emergency plan which includes communications needs, community recovery, and a crisis center.
2. Review and update plan at least annually.

ER-#3

"An ongoing training program for those employees who have response or communications responsibilities in the event of an emergency."

Practices:

1. Training for responders including fire training; HAZWOPER training; brigade training; and American Association of Railroad Tank Car Safety, or equivalent, for Safety personnel; and at least two key Operations personnel.
2. Training for employees with communications response responsibility is Ammerman Training, or equivalent, with a refresher every third year. At a minimum, covered employees will include the Plant Manager, Plant Superintendent, Employee Relations Director, Safety Director and Director of Environmental Control.

ER-#4

"Emergency exercises, at least annually, to test operability of the written emergency response plan."

Practice:

Conduct at least one emergency drill annually. The drill will include a critique and follow-up, and the emergency communication element.

ER-#5 "Communication of relevant and useful emergency response planning information to the Local Emergency Planning Committee."

Practices:

1. Keep an updated emergency plan on file with the LEPC.
2. Annually offer to meet with the LEPC or its staff to tour the plant and discuss our emergency plans.

ER-#6 "Facility tours for emergency responders to promote emergency preparedness and to provide current knowledge of facility operations."

Practice:

Annually hold at least one plant tour and presentation for first responders. Invite appropriate first responders.

ER-#7 "Coordination of the written facility emergency response plan with the comprehensive community emergency response plan and other facilities. If no plan exists, the facility should initiate efforts to create a plan."

Practice:

Annually review and compare our plan and the community plan to assure compatibility. Adjust our plan where necessary to assure compatibility.

ER-#8 "Participation in the community emergency response planning process to develop and periodically test the comprehensive community emergency response plan developed by the Local Emergency Planning Committee."

Practices:

1. Belong to and participate in the CAER group.
2. Cooperate with and assist the LEPC whenever possible.
3. Participate in and/or assist with appropriate community emergency drills.

ER-#9 "Sharing of information and experience related to emergency response planning, exercises, and the handling of incidents with other facilities in the community."

-6-

**Practice:**

Participate in local emergency response organizations. Review problems of mutual interest with other facilities in the community as they relate to emergency response planning, exercises, and the handling of incidents.

To: J. Friend

From: C. R. Dutra

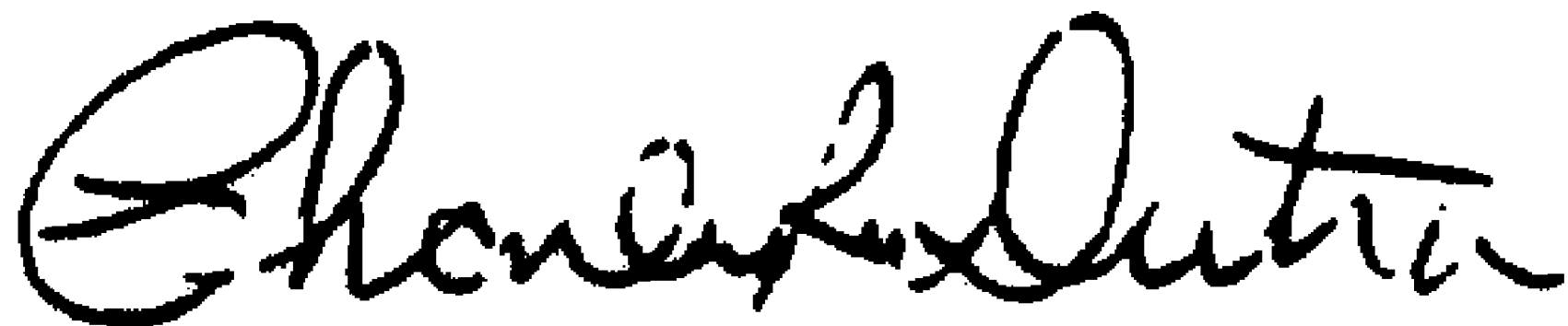
Interoffice  
Communication

Date: October 2, 1991

Subject: LCCP Practices for the Distribution Code of Management Practice

VIS

Attached as Table I are the LCCP Practices for the CMA Distribution Code. These practices were developed at the September 30, 1991 meeting of the Responsible CARE Steering Team.



C. R. Dutra

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Enclosure

cc + enc: CWT MGH KLF

TABLE I

## DISTRIBUTION CODE OF MANAGEMENT PRACTICE

Code Element 1.1 - Corporate Responsibility.

Code Element 1.2 - Corporate Responsibility.

Code Element 1.3 - Corporate Responsibility.

Code Element 2.1 - Corporate Responsibility.

Code Element 2.2 - "Training for all affected company employees in the proper implementation of applicable regulations and company requirements."

1. Determine LCCP needs based on the applicable regulations and ensure employees receive adequate training.

Code Element 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. Document LCCP specific requirements and communicate these to corporate environmental for inclusion in the communication they send to carriers, distributors and contractors performing distribution activities.

Code Element 2.4 - "Regular reviews of company employee, carrier, distributor and contractor compliance with applicable regulations and company requirements."

1. LCCP will document incidents of carrier non-compliance which occur while on the LCCP site and coordinate feedback to the carrier by S&T.

Code Element 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."

1. Motor Carrier Performance Team will include requirements for carrier safety fitness and regulatory compliance in qualifying carriers.
2. For carriers in other modes of transportation specific to LCCP and not covered by the Motor Carrier Performance Team, a process will be developed with S&T for their qualification.

-2-

**Code Element 3.2** - "Feedback to carriers on their safety performance and suggestions for improvement."

1. LCCP will provide feedback to S&T on safety issues occurring within the confines of the plant for transmittal by S&T to the appropriate carriers.

**Code Element 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."

1. LCCP will check, using documented procedures, all containers for leaks and visible defects before shipment.
2. LCCP will work with S&T and R&D to provide chemical compatibility information for the choice of proper shipping containers by S&T.

**Code Element 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."

1. LCCP will develop written loading procedures for each mode that are designed to reduce emissions to the environment, protect personnel, and provide securement of the lading during transit.

**Code Element 4.3** - "Documented procedures for unloading chemicals at company facilities that will reduce emissions to the environment, protect personnel, and provide the safe unloading into proper storage facilities."

1. LCCP will develop written unloading procedures for each mode which are designed to reduce emissions to the environment, protect personnel, and provide the safe unloading into proper storage facilities.

**Code Element 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."

1. LCCP will provide information and guidance to S&T for S&T's development of criteria for cleaning and return of tank cars, tank trucks, and returnable/refillable bulk containers and on proper disposal of cleaning residues.

**Code Element 4.5** - "A program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing the companies chemicals."

1. LCCP will provide information and guidance to S&T on developing information S&T will provide to customers, distributors and other receivers on the proper procedures for unloading and storing Vista's chemicals.

Code Element 4.6 - Corporate Responsibility.

Code Element 4.7 - Corporate Responsibility.

Code Element 5.1 - "A process for responding to chemical distribution accidents/incidents involving the company's chemicals."

1. LCCP's participation in the Chemical Transportation Incident Response Plan (CTIRP) will be maintained and reviewed annually and modified as needed.

Code Element 5.2 - "Documented procedures for making information about the company's chemicals in distribution available to response agencies."

1. LCCP will develop written procedures for making information available to pertinent local emergency response agencies; S&T will be responsible for distributing to non-local agencies.

Code Element 5.3 - "A program for making facilities and/or training materials available to emergency response agencies."

1. LCCP will continue to participate in the local CAER, Mutual Aid, LEPA, and other industry/community alliances as it relates to training.

Code Element 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."

1. Transportation issues are included as a major part of the local CAER, LEPC and LEPA contingency plans. LCCP will continue to participate and support the activities of these local agencies and will annually review and update contingency plans as appropriate.

Code Element 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."

1. LCCP will incorporate transportation issues as a part of its community out reach programs under the CAER Code of Management Practices (Elements 5, 6 and 7).

Interoffice  
Communication

To: Responsible Care Steering Team

From: M. G. Hayes

Date: October 9, 1991

Subject: Pollution Prevention Code Management Practices

VIS

The following are Code Management Practices which will be implemented by the LCCP for the Pollution Prevention Code:

1. A clear commitment to pollution prevention from Vista senior management will be provided through policy, communications and resources.
2. An initial inventory of wastes generated and releases to air, water, and land will be completed.
3. The release evaluation will be performed in 1991 as follows:
  - A. Air will be based on EIS/PS and SARA 313, and ranked:
    - (1) Considering quantities released.
    - (2) Health risk associated with each chemical
    - (3) Human health risk will consider acute and chronic risk.
    - (4) Ecological effects will be considered.
  - B. Water will consider NPDES Discharge Monitoring Report data, Spill Report data, SARA 313 Water data, NPDES Permit Application data, and Biotoxicity Testing data; and ranked:
    - (1) Considering health effects.
    - (2) Considering ecological effects.
  - C. Land releases will consider the risks presented by land disposal units used. Risks associated through use of these operations will be determined by an annual evaluation.
4. In order to educate and communicate with the public about the waste inventory, impact evaluation, level of risk posed by releases, and waste and release reduction priorities, the LCCP will:
  - A. Annually conduct a solicitation/survey of the community concerns about the facility followed by an analysis of the data. Respond appropriate to concerns.

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- B. Conduct plant tours for at least three groups from the plants' various audiences. Conduct presentations during the tour on risks posed by the facility.
  - C. Publish an LCCP report annually considering environmental issues. Distribute to employees, appropriate citizens, and the media. Make the report available to interested parties.
  - D. Issue a SARA 313 report to employees by October 1 of each year.
  - E. Use Vista Visions and the Weekly Vision to supply environmental program information.
  - F. Sponsor and participate in the I-10 Citizens Advisory Panel.
  - G. Establish, through a policy statement in the first annual report, the availability of tours of the facility conducted on a monthly basis, and the availability of presentations.
  - H. Maintain a policy of timely and cooperative response to media requests.
- 5. Priorities, plans, and goals for waste release reductions will be developed in the 1991 calendar year. Annually thereafter community and employee concerns will be used in reevaluation of goals and priorities.
  - 6. Priorities, plans, and goals will be implemented through use of an action plan that yields measurable reductions in releases and waste generation.
  - 7. A quantitative inventory will be conducted annually to measure action plan progress and results.
  - 8. In addition to Code Management Practices, identified in #4 above, the following practices will be implemented for employee dialogue:
    - A. Data from the annual survey will be presented in a meeting, held at least annually. Questions will be solicited and responded to at that time.
    - B. The ESAR program under the Central Safety Committee will be maintained.
    - C. Employees will be informed of significant items developed in response to responsible care. Employee feedback will be solicited.

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- D. Employee concerns will be solicited as a part of each monthly safety meeting.
9. Waste and release prevention objectives will be satisfied for new or modified facilities, processes and products through a rigorous evaluation.

Every design of new or modified facilities, processes and products will include the study of the potential for reductions in wastes and releases. The designs will be modified as needed to optimize environmental control and waste minimization.

The options identified in the above study will be itemized in the environmental impact statements of the process designs.

10. An ongoing program for promotion and support of waste and release reduction by others will include:
- A. Participation in local civic activities, such as Earth Day, which educate others on non-industrial sources and means to reduce waste and releases.
  - B. Our ongoing dialogue with customers and suppliers will include evaluation of opportunities to recover unused products instead of disposal as wastes. Also, during the audits of our suppliers and the interaction with customers, we will include an evaluation of environmental control and waste minimization.

Elements 11 through 14 will be assessed after further guidance from CMA.

*M. G. Hayes*  
M. G. Hayes

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OCT 30 1991

To: Responsible Care Steering Team

From: C. W. Turner

Interoffice  
Communication

Date: October 29, 1991

Subject: LCCP Practices for the Process Safety Management Code

VIS

The following are code management practices which will be implemented by the LCCP for the Process Safety Management Code:

Code  
Elements

- 1 Deferred pending guidance from Corporate on Management Practice related to "Leadership by Senior Management..."
- 2 Establish process safety goals on at least an annual basis, with responsibility being assigned for individual elements.
- 3 Progress toward established process safety goals will be reported periodically.
- 4 A compliance audit system will be developed and implemented as appropriate.
- 5 Establish a procedure for reporting all incidents (which resulted in or could have resulted in fires, explosions or accidental releases), and classifying them for level of investigation by a team or individual. Investigation will include identification of cause and recommendation on ways to prevent the incident. Action items from the investigation will be tracked to insure corrective action is taken and will be reported to employees.
- 6 Maintain membership and participation in Industry and Government organizations such as LEPA, LEPC, CAER, SW LA Mutual Aid Association, CMA and LCA.
- 7 Feedback from CAER and public advisory groups will be taken into account in the design and operation of facilities.
- 8 Develop and organize an archive of design information, P&ID's, operating parameters, and operating procedures.
- 9 Maintain current MSDS's on all process chemicals, assemble and document process hazards.

DEVELOP  
COMPLIANCE  
AUDIT SYSTEM  
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- 9 Every five years a hazard analysis will be conducted on every process. The methodology used for this analysis could vary from a HAZOP type of analysis on large complex processes to a checklist type of analysis for simpler, smaller processes.
- 10 A plantwide policy of management of change will be developed and adopted.
- 11 Establish specific management responsibility for setting criteria for site selection and plot plan layout, and establish an approval process for consideration of deviations or exceptions. These criteria will apply to both new projects and extraordinary plant activity such as construction and major turnarounds.
- 12
  - a. Utilize the existing company engineering standards (updated Conoco standards) in the design, construction, and maintenance of plant facilities. A mechanism will be established which defines approval requirements for deviations from these standards.
  - b. Define specific responsibilities for the review and updating company standards as regulatory and voluntary code changes are made.
- 13 Document procedures for safety reviews to be completed prior to startup of new and modified facilities to ensure compliance with intended design and verify facilities are safe for startup and operation.
- 14 The facility maintenance, inspection, and testing programs will incorporate the following elements:
  - a. Documentation of maintenance procedures and results of inspection and testing.
  - b. Define appropriate preventative maintenance and inspection frequencies for specific equipment and instrumentation systems.
- 15
  - a. The design criteria for new facilities (MP-12) will include evaluation of the independence of critical systems to prevent escalation from a single failure to a catastrophic event.
  - b. The preventative maintenance and inspection programs (MP-14) will include testing and inspection to ensure operability of stand-by/safety systems.

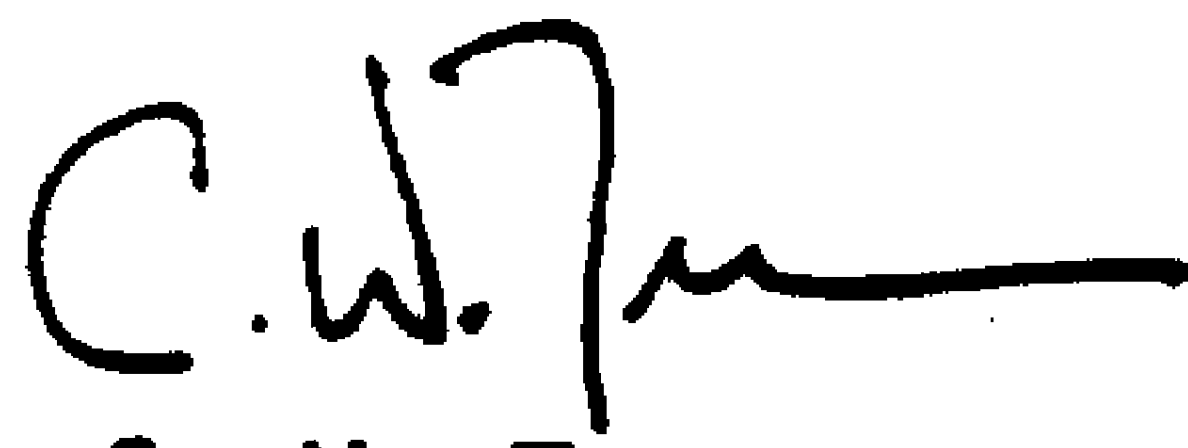
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- 16 Standard operating procedures will be reviewed and revised as necessary to include the control of process equipment during emergency situations due to the process upset, utility disruptions, and other external conditions.
- 17 Screening of candidates for employment will include the use of either minimum education level standards and/or knowledge or skills testing. This initial screening will verify candidates possess the necessary fundamental ability to qualify for future assignments within the facility.
- 18 Clear, written procedures for normal operating and maintenance activities will be developed and maintained. The LCCP Safety and Health Manual will include the plantwide procedures and specific procedures will be developed for individual departments.
- 19
  - a. Perform a multi-week pre-operation training program, including both classroom and on-the-job instruction, for new hires using experienced instructors. Other features of the program include safety training, testing, and performance evaluations.
  - b. For non-field new hires (office, technical) the new employee training will include safety orientation.
- 20 Methods will be developed for testing and competency demonstration for all operating and maintenance positions. Competency can be determined in several ways but the employee must demonstrate sufficient knowledge of the procedures, through various testing and/or skills demonstration, to perform his/her job.
- 21
  - a. A substance abuse policy designed to ensure that employees in critical jobs are fit for duty and are not compromised by external influences, including alcohol and drug abuse, will be maintained and followed.
  - b. The company will ensure employees are fit for duty through the use of periodical physicals (minimum frequency = 3 years) and requiring releases from medical professionals before allowing employees to return to work after extended absences.

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- 22      Develop a program for ensuring that contractor practices are consistent with the applicable sections of this code. This includes:
- a.    Safety orientation for contract workers.
  - b.    Require compliance with Vista safety rules in the contracts and monitor work practices in the field to verify compliance.

Please review these notes and contact me if any changes are needed.



C. W. Turner

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Dist.: JF KLF CRD MGH