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FROM: T. G. Grumbles

DATE: May 5, 1986

Interoffice
Communication

SUBJ: SUPERFUND REPORTING OF TRANSPORTATION INCIDENTS

6/18/86
6/5
6/25
7/15
VISTA

Attached is a memo discussing an additional educational need for transportation personnel. I would think the Superfund reporting requirements for specific chemicals could be covered during the specific chemical training that is to be done, or information could be developed for use at safety meetings.

Please let me know now your thoughts on how best to proceed.


Thomas G. Grumbles

ajo/9

Attachment

DISTRIBUTION

R. D. Gamblin
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M. S. Reynolds

VVV 000017089

TO: T. G. Grumbles

FROM: Michele M. Goodreau

DATE: April 28, 1986

Interoffice
Communication

SUBJ: SUPERFUND REPORTING OF TRANSPORTATION INCIDENTS

VISTA

When a transportation incident involves the release of product to the environment, how does the carrier know if the National Response Center (NRC) should be called? From the Transportation Department Operation and Safety Manual? How do common carriers know? CTIRP states it is the responsibility of the carrier to contact NRC. In reality, do they? Do they have sufficient information to know when to call? I bring these questions up because the carrier is the first responder to transportation incidents and speed of notification may soon become a media issue as it has in plant releases.

On August 11, 1985, Union Carbide released 500 gallons of a chemical mixture, called the National Response Center within 20 minutes, and was publicly criticized for failing to notify the authorities immediately. Prior to this and several related incidents, Vista, like most of the industry, had taken the position that notification within 24 hours met the regulatory requirement for "immediate". EPA has now, for the first time, stated that "immediate" notification does not, and has never meant, within 24 hours.

As a result of these incidents and EPA's statement, the Vista manufacturing facilities have developed new reporting guidelines and means for communicating them to employees, including the posting of them on bulletin boards. This same emphasis on immediate reporting needs to be relayed to those parties involved in transportation incidents.

I propose that this topic be discussed at the next CTIRP Management Meeting. I have some ideas on how to reduce the time lag between when the incident occurs and when it is reported. Please give me your comments on this matter.

M. M. Goodreau

M. M. Goodreau

ajo/1

VVV 000017090

To: D. A. Kuhn

From: T. G. Grumbles
Date: May 2, 1986

Interoffice
Communication

Subject: PROGRESS REPORT FOR THE WEEK ENDING MAY 2, 1986

VISTA

1. Reviewed DOT and FDA regulations to determine if food commodities could be shipped in PVC resin trucks.
2. Assistance was given to the Aberdeen Plant in filing the required EPA notification for marketing API Separator Oil as a hazardous waste fuel.
3. Developed Material Safety Data Sheets and labels for Quench Solids and LPA 190 Solvent.
4. Met with LCVCM, LCLAB and LCCP Safety Directors regarding LCVCM's recent OSHA citation under the Hazard Communication Standard.
5. Scheduled industrial hygiene audits at the LCVCM and LAB Plants for the week of July 14.
6. Researched PCB regulations for the Baltimore Plant.
7. Continued work on the FIFRA registration of VMC 100. Reviewed test methods and contract laboratories.

Thomas G. Grumbles

ajo/9

VVV 000017091