

Vista Chemical Company

15990 North Barker's Landing Road
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

TO: Mr. Bill
IF: none

February 24, 1988

VISTA

William J. Popendorf, Ph.D., C.I.H.
Inst. Agricultural Med. AMRF.
University of Iowa
Iowa City, A 52242

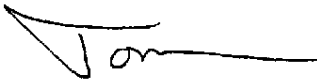
Dear Bill:

I am writing for two reasons. I just read your report in the February journal.

The first is where did you get your Edison and Ford examples? These are excellent cases to use in presentations and if you have a source for them I'd appreciate a copy or information on how to obtain one.

The second purpose is I agree and support your thoughts on AIHA being active in helping address the problem of risk communication in the public arena. We in the industry will be learning a lot about that this year as Section 313, of SARA, emission reports become public. We'll probably learn the hard way initially, but an AIHA effort is certainly needed. We, hygienists, will often be called upon to write or present such issues.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

cek

VVV 000009979

— VOL. 1000000000
OF OSHA-HAZ COM

TO: Mark Jakel

FROM: T. G. Grumbles

DATE: February 24, 1988

Interoffice
Communication

SUBJ: EXPANDED OSHA HAZARD COMMUNICATION STANDARD:
APPLICABILITY TO TERMINALS

VISTA

The expanded Hazard Communication (Haz Com) standard will require the S&T transport terminals to obtain and maintain MSDS's and labels, train employees and develop a written Haz Com program for each location. The compliance date is May 23, 1988. Details and thoughts on these requirements are below:

Material Safety Data Sheets and Labels: The standard requires non-manufacturing employees, who have employees exposed to hazardous materials, obtain and give employees access to MSDS's for the chemicals handled. If a contractor brings hazardous materials on-site that employees may be exposed to, MSDS's must be obtained from the contractor. If we do not receive MSDS's from the supplier of the products handled, we have a responsibility to obtain one. Labels on containers, i.e. drums, shall not be removed from the containers that are handled.

From a practical standpoint, we must do the following:

- 1) Obtain a MSDS for each product the transports will carry, bulk or package.
- 2) Maintain these MSDS's and give ready access to them.
- 3) Train the drivers in how to read or use MSDS's.

Employee Training: Employees must be trained in the hazards of the chemicals they handle in the work place; specific elements of the training are listed in the standard (attached). Some difference in requirements exist for substance handled only in sealed containers, such as Aberdeen back-hauls. The training can be done on a "hazard class" basis if necessary due to a large number of individual chemicals handled.

For this requirement, I suggest the following:

- 1) Determine and list the common or routine chemicals handled.
- 2) Review with the manufacturing locations what training materials may be available for those listed.
3. Determine "who and how" to do training.

VVV 000009980

Mark Jakel

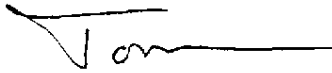
2/24/88

Page Two

Written Hazard Communications Program: A written program describing how you will be meeting the requirements must be developed for each site. A program for a terminal would include the following:

- 1) A list of hazardous materials
- 2) Methods we will use to inform employees of non-routine tasks (maintenance, etc.), and the hazards associated with those tasks.
- 3) Material Safety Data Sheets
- 4) Explanation of labeling systems used in the work place
- 5) A description of how we make MSDS's available and how we obtain them
- 6) Method used to exchange hazard information with contractors, including explanation of our labeling
- 7) Description of our training program

I've attached a copy of the standard and the preamble. Page 31861 has a good discussion of the applicability of some of the standards' requirements to non-manufacturing locations. The actual standard starts on page 31877.



T. G. Grumbles

cek

cc: Fred Thomas
W. L. McClain

VVV 000009981

RF

Thomas G. Grumbles

VISTA

To: Dave Campanella
Ed Kieschnick
Joe Ford

Date 2/12

Re: Presentation to Supervisors

Attached is a copy of the
presentation from the Houston
Mgmt Meeting.

I'm not sure the emphasis is
right for the plant supervisors.

Please review and let's discuss
next week so I can structure
my talk appropriately.



VVV 000009982

Thomas G. Grumbles

VISTA

To Allen Nielsen

Date

Per our discussion attached
are the GLP guidelines

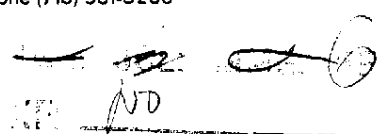
TGS

VVV 000009983

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VISTA

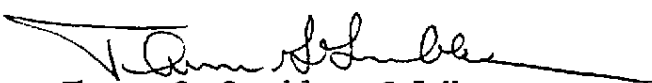
February 9, 1988

Mr. B. I. Raffle
Supervising Counsel
Environmental & Engineering Group
Conoco Legal Department
P.O. Box 2197
Houston, TX 77252

Dear Brad:

With this letter I am transmitting records relating to activities prior to July 20, 1984. These files contain information regarding environmental, safety and health activities at the Newark, Chocolate Bayou, and Matagorda plants.

Sincerely,


Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo

cc WLM

VVV 000009984