

TGG: JCL: ERT: MJH: AJO: RF

TO: Distribution

XF: _____

FROM: T. G. Grumbles

DATE: July 3, 1990

Interoffice
Communication

SUBJ: TRANSPORTATION EMERGENCY RESPONSE SYSTEM: CTIRP

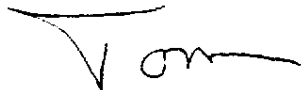
VISTA

Vista has a defined process for responding to transportation problems. The system, known as CTIRP (Chemical Transportation Incident Response Plan) has recently been revised. A manual will be distributed to you in the near future. This will be for reference mostly in that marketing will generally have one action to take if they should receive a customer call regarding a problem with transportation of Vista products. That is, to call our 24-hour emergency number at the LCCP, 318-494-5142. The person who answers is trained in initiating our response mechanism.

For your immediate information, I've attached the basic process flow and introduction to the CTIRP manual. Please note the scope section.

I've attached phone stickers that can be used to provide ready access to the emergency phone number.

Please call me if you have questions.



T. G. Grumbles

dlj
.117

Attachment

cc: CTIRP COMMITTEE

W. L. McClain, M. S. Reynolds, T. H. Huffman, P. C. Gowan
K. L. Fogg-LCCP

B. E. A. Larsen, R. Swantkowski, J. Hall, C. Matson

Distribution: G. Marchand, M. Fortier-Lisle
B. Means-Santa Ana
G. Smith

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INTRODUCTION

GENERAL

Vista Chemical Company is committed to distributing its products without threat to employees, the general public, or the environment and without product loss. In addition, the Company seeks to comply with all state and federal regulatory requirements concerning transportation incidents. While the Company strives for safe distribution, the CHEMICAL TRANSPORTATION INCIDENT RESPONSE PLAN (CTIRP) has been prepared to deal with transportation incidents should they occur. Employees likely to become involved in a transportation incident or response should be familiar with the procedures established in this plan.

When a transportation incident occurs, Vista's primary goal is to provide timely response as required to control and eliminate the emergency situation. When an incident involves a common carrier, and appears to result from the failure of the carrier to satisfy its responsibilities as carrier (i.e., derailments, collisions, etc.), Vista will function in an "advise/assist" capacity. If a carrier cannot or will not assume responsibility for handling a transportation incident which involves a carrier responsibility, and action is required, Vista personnel will take a more active role.

When Vista is the carrier (i.e., Vista-owned trucks) or when the incident involves or results from a Vista responsibility (i.e., maintenance-related problems, container integrity problems which should have been addressed prior to shipment, etc.) Vista will assume a more primary and active role in responding to the incident.

PURPOSE

This document has been developed to fulfill the following purpose:

1. To establish a uniform procedure for responding to transportation incidents involving Vista Chemical Company products, both regulated and non-regulated.
2. To establish communication procedures and responsibilities to ensure proper notification of company management of all transportation incidents.
3. To document regulatory requirements concerning chemical transportation incidents and assign responsibility for fulfilling those requirements.

SCOPE

A transportation incident is defined as a spill, leak, fire, release, personnel exposure, injury, equipment failure, or accident involving a Vista Chemical product, waste, or piece of equipment while in transit between the manufacturing point and the user.

Examples of transportation incidents may include, but are not limited to:

- Railcar Derailments
- Transport Truck Accidents
- Failure of Container Safety Devices
- Situations Involving Loading Defects (i.e. leaking gaskets on dome lids)
- Customer Problems of a Safety Nature Relating to Shipping Containers

Pipelines are considered outside the scope of this plan.

Delivery delays are not considered transportation emergencies.

Product releases at a Vista Chemical manufacturing plant requires emergency action, but is not considered within the scope of this plan. In-plant emergency procedures are covered in each plant's emergency plan, and Vista Chemical Company's Emergency Communication Plan.

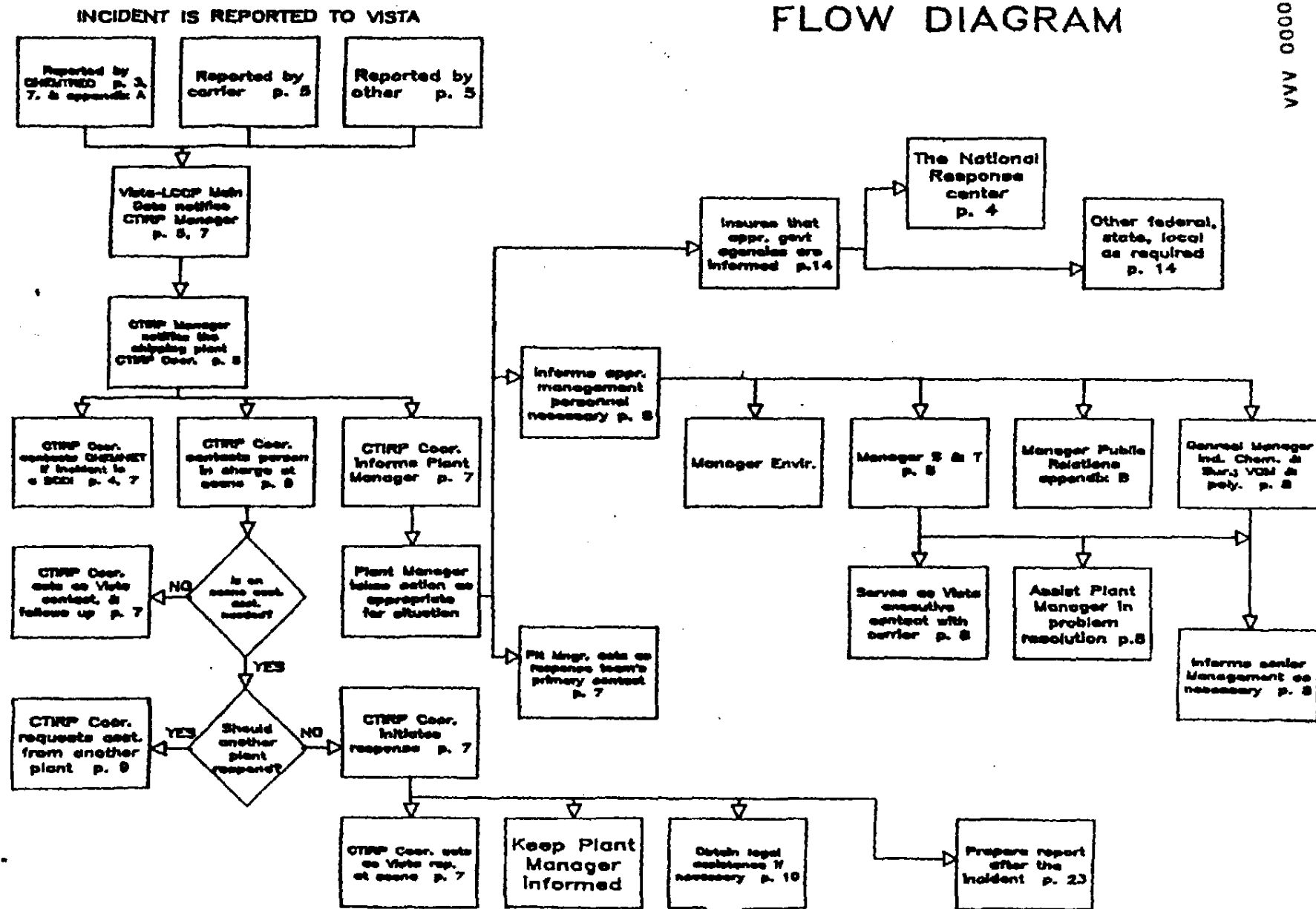
Each plant will develop its own written transportation incident procedures and include details specific to that plant and its products.

The Vista Transportation Department Operations and Safety Manual, Transport Operations, includes transportation emergency procedures addressing motor carrier requirements. A synopsis of that plan is included in Section I.X.

Product terminals other than plant locations and all processors are not part of this procedure and are handled under a separate procedure.

CTIRP INCIDENT FLOW DIAGRAM

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Interoffice
Communication

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: July 6, 1990

SUBJ: PROGRESS REPORT

VISTA

1. MJH participated in Environmental Awareness Training for the Lisle sale office.
2. The DOT Team performed its first plant assessment at the Hammond Plant.
3. The Central Recordkeeping System (CRS) Team has reformed to discuss issues related to central storage of all plant raw materials MSDSs.
4. An environmental audit of the OKC Plant was conducted June 28-29. The plant's programs are in good shape.
5. The LAB Plant environmental audit was finalized and distributed.
6. The first draft of the Premiere environmental audit and the Hammond DOT audit was distributed.

Tom

T. G. Grumbles

dlj

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