

To: Jim Rutledge

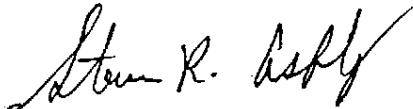
From: S. R. Ashby
Date: June 3, 1986

Interoffice
Communication

Subject: OSHA Hazard Communication
If-Needed Statement
VCM Plant Response

VISTA

Attached is a response for the VCM Plant to question #1 of your if-needed statement. The response to question #2 on the Aberdeen statement should be used "as-is" for the VCM Plant statement.



S. R. Ashby

kf
cc: RAC

CWH 000006144

Question 1:

What Hazardous Chemicals Do You Have in Your Plant?

Answer 1:

The VCM Plant uses and produces several chemicals which are considered hazardous by OSHA standards. We handle large volumes of vinyl chloride monomer, ethylene dichloride, chlorine, hydrogen chloride and ethylene. Two by-products, heavy ends and light ends, are present in smaller quantities. In addition, we use relatively small quantities of many other chemicals, such as water treatment chemicals, acids, and sodium hydroxide which are considered hazardous by OSHA.

All of the chemicals used in the VCM Plant are handled according to established safety procedures, developed to assure continuous safe plant operation.

CWH 000006145

(X)

To: Distribution

From: Jim Rutledge *JR*
Date: June 2, 1986

Interoffice
Communication

Subject: OSHA Hazard Communication If-Needed Statement

The attached if-needed statement, prepared at the request of Aberdeen plant management, has been approved for use should that plant receive any media queries on the new OSHA Hazard Communication Program. Note that most of the material is applicable to any Vista plant; only the answer to Q1 is specifically geared for Aberdeen.

Ralph Ferrell asked me to work with the other plants on developing a comparable site-specific response for each Vista location.

Could you review the statement, including the "Aberdeen" answer, and help me prepare a similar response for your plant?

Thanks for your reply by Thursday, June 5, or sooner.

DISTRIBUTION:

Plant Managers (except Aberdeen)

cc: RTF, JF, JWW, TGG, WLM, MSR, DAK

CWH 000006146

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FROM VISTA TIMBERWAY



If-Needed Statement

**OSHA's Worker Hazard Communication Standard
Aberdeen Plant**

Date approved for use: June 2, 1986

Sunday, May 25, was the deadline for full compliance with the new Hazard Communication Program promulgated by the U.S. Occupational Safety and Health Administration (OSHA). This standard requires all manufacturers, transporters and users of a wide range of listed chemicals to develop procedures for evaluating the workplace hazards of those chemicals pertinent to their operations, following specific OSHA guidelines, and to produce or obtain a material safety data sheet (MSDS) for each. In addition, all workplace containers with hazardous chemicals must meet expanded labeling requirements. Finally, all employees handling or working with hazardous chemicals must receive training in the specific hazards associated with those materials.

Vista Chemical fully supports the purpose of the new standard, which is to provide effective communication of potential hazards to workers, customers and others handling hazardous chemicals. Although Vista had to implement certain administrative measures to fully comply with the final regulations—such as posting additional signs in our plants for specific chemical hazards and obtaining updated or expanded MSDSs from our suppliers—the company has long been a leader in complying with the goal of the regulations. For example, even prior to Vista's formation in 1984, when it purchased the assets of Conoco Chemicals from Du Pont, the company had taken the lead in preparing MSDSs for its products. The company's regular safety training programs for employees and others working in our plants have for many years provided information on specific chemical hazards at each location. The new measures only add to Vista's existing workplace hazard communication efforts.

All plants operated by Vista Chemical Company are in full compliance with OSHA's new Worker Hazard Communication Standard.

Use the following material only in response to specific questions from the media:

Q #1. What hazardous chemicals do you have in your plant?

A #1. Although none of the products leaving the Aberdeen plant—various grades of polyvinyl chloride (PVC) resins, dryblends and compounds—are considered hazardous

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by OSHA standards, we do handle large volumes of certain hazardous chemicals, such as vinyl chloride and some alcohols. In addition, we maintain relatively small quantities of many other chemicals, such as compounds of lead, antimony and acids, which OSHA has listed as hazardous.

Q #2. How has the new standard been implemented in your plant?

A #2. We have evaluated the hazardous properties of each of the chemicals used in our plant, prepared or obtained the required MSDSs from our suppliers and taken steps to label all containers holding these chemicals or to post all areas of the plant where they are present. Plans are already underway to update our existing employee training programs to include information on additional chemical hazards.

We at Vista are proud of our long record as a leader in the chemical industry for maintaining a safe and hazard-free workplace for all our employees and the local community. We welcome and support measures such as the new OSHA standards, whose purpose is to increase the safety of all who manufacture, transport or use hazardous chemicals through more effective communication about their potential hazards.

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FROM VISTA TIMBERWAY