

TO: R. D. Gamblin

TGG: ~~JG~~ ~~EGJ~~ AC: ~~AJO~~ ~~RE~~

XF: DESK

FROM: T. G. Grumbles

DATE: August 2, 1991

Interoffice
Communication

SUBJ: PROPOSED CONTENT FOR RWE QUARTERLY ENVIRONMENTAL SAFETY &
HEALTH REPORTS

VISTA

Attached is the proposed content of RWE quarterly reports for environmental, safety and health matters. I am providing copies for comment to the copy list below.

The report will contain five basic sections;

- 1) Compliance Issues
 - a. Environmental
 - b. Safety and Health
- 2) Lawsuits
- 3) Capital Projects
- 4) Significant Regulatory Activity Impact
- 5) Product Safety and Acceptance Issues

1. Regulatory Compliance

This section would include significant items related to non-compliance events. Non-compliance with State and Federal Regulations would be considered. Items considered for inclusion would be notices of violation, compliance orders, and penalty assessments that have a total financial impact (penalties, compliance capital, etc.) of greater than \$500,000.

2. Lawsuits

This section would include Department of Justice, Civil, State, Citizen Suit Action and Toxic Torts. A summary of the number of suits received with an analysis or brief discussion of any expected to exceed \$250,000 in impact.

3. Capital Projects

This section would include the development and progress of capital projects exceeding \$2 million. The projects would be those directly related to regulatory or voluntary actions. Applicable cost-sharing or APA liability issues would be included in these discussions.

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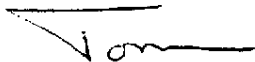
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4. Major Regulatory Activity Impact

This section would include regulatory activity that we believe will have a potential capital impact exceeding \$2 million to achieve compliance. The activity may include new regulations and actions under existing regulations such as Superfund.

5. Product Safety/Acceptance

This section will include regulatory or commercial issues affecting product viability. These items may include manufacturing restrictions, product end-use or product constituent issues.


T. G. Grumbles

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cc: John Burns, Betsy Meyer, Mark Schneider

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