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FROM: T. G. Grumbles

DATE: May 15, 1990

Interoffice
Communication

SUBJ: ENVIRONMENTAL SEMINAR

~~TO: JCL: EST: MUE: AUC: RF~~

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VISTA

AGENDA
ENVIRONMENTAL SEMINAR
NEW PRODUCT DEVELOPMENT BARRIERS
MAY 22, 1990
BOARD ROOM 9:30-11:00
(PLEASE NOTE TIME CHANGE)

PURPOSE: Review and discuss the regulatory, commercial, and Vista process issues impacting new product development

1. Introduction - General Issues 5 min
2. Definition - What is a new Product? 5 min
3. Regulatory Issues 20 min
 - a. EPA
 - b. OSHA
 - c. Foreign Rules
4. Commercial - Regulatory vs. Reality 10 min
5. Vista Process - Liability Control 15 min
6. Summary 5 min
7. Discussion

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dlj

Distribution: R. J. Andersen, J. D. Burns, J. R. Ball, J. A. DeBernardi, G. G. Draper, R. T. Ferrell, H. R. Flammer, N. C. Frost, R. D. Gamblin, T. H. Huffman, B. E. A. Larsen, M. J. Schneider, W. J. B. Vogel, J. J. Weidner, W. L. McClain, D. L. Cohen, J. C. Ledvina-Houston

V. W. Weiss-Austin

VEV-308747

TGG-JCL: ~~ENV~~ MIN: AJO: RF

XF: none
BOARD OF DIRECTORS MEETING
ENVIRONMENTAL BRIEFING

MAY 17, 1990

AGENDA

GOALS

1. Provide a status report on where Vista is in regards to current environmental compliance and emissions reductions.
2. Provide information on current regulatory activity and compliance projects to meet new requirements, significant ongoing projects, and review anticipated regulatory activity in the near future.
3. Provide an update on CMA's Responsible Care Program and Vista's Environmental Policy Implementation.

I. Vista Environmental Status

TIME

A. Compliance and Enforcement Actions

5 MIN

This discussion will review Vista's recent enforcement history in the environmental area. The content of significant penalty actions and dollar amounts of penalties proposed will be discussed.

B. SARA 313 Emissions Data

5 MIN

SARA 313 requires that all releases of approximately 405 listed "Toxic" Chemicals be reported annually to the EPA. This data is also available to the public, by request, or through an on-line computer based system. The first two years of Vista's data will be presented and briefly discussed.

II. Current Regulatory Activity and Compliance Project Work - The Challenges

30 MIN

- A. Toxicity Characteristic - EPA has promulgated a new rule under RCRA that will dramatically increase the amount of solid waste, including wastewater, that must be managed as hazardous. As a result, many surface impoundments will be regulated under RCRA for the first time. The impact on Vista and projects to achieve compliance will be reviewed.

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- B. Benzene Waste Operations NESHAPS - EPA has promulgated a new rule that will require controlling the air emissions from certain waste operations that contain benzene. The impact on Vista and necessary compliance projects will be reviewed.
- C. Resource Needs - The current capital projections and manpower requirements for environmental projects will be reviewed.
- D. Future Regulatory Challenges - The anticipated near term regulatory activity will be discussed. This includes further Clean Water Act permit activity and air toxics regulations.
- E. Ongoing Projects - Significant ongoing projects will be reviewed. These include groundwater remediation and superfund activities.

III. Vista Environmental Policy\Responsible Care
Update - Since adopting the Environmental Policy in the fall of 1989, and signing the CMA Responsible Care Principles, multiple activities resulted in implementing both. A brief review of the status and future activities involved will be given.

5 MIN

ACRONYM DICTIONARY

It is difficult to discuss environmental and regulatory issues without liberal use of acronyms and initialisms. Below are the ones that will be used in this presentation.

- SARA - Superfund Amendments and Reauthorization Act of 1986
- 313 - The section of SARA that requires annual reporting of emissions and releases of some 405 listed chemicals and chemical categories.
- Toxicity Characteristic (TC) -
Revised definition of waste, solid or liquid, which sets the standards for its classification as hazardous or non-hazardous. Replaces the existing Extraction Procedure (EP) Toxicity definition.
- RCRA - Resource Conservation and Recovery Act of 1976. This act establishes controls of the handling and disposal of solid wastes and hazardous wastes.
- NESHAPS - National Emission Standards for Hazardous Air Pollutants. These rules establish emission limitation for pollutants the agency judges to possess a significant potential for causing health problems.
- NPDES - National Pollutant Discharge Elimination System. This is the framework under which the content and permitted amounts of pollutants in our plant waste water and stormwater is regulated.
- OCPSF Guidelines -
Organic Chemicals, Plastics and Synthetic Fibers. These are the chemical industry technology-based effluent treatment standards that will apply to Vista in our next NPDES permits.