

Interoffice
Communication

TO: Distribution

~~TSG: JCL: BMT: MSH: AJO: RF~~
XF: Desk

FROM: T. G. Grumbles

DATE: July 11, 1990

VISTA

SUBJ: REVIEW OF RESPONSIBLE CARE DISTRIBUTION CODE OF MANAGEMENT
PRACTICE

Attached is the draft Distribution Code of Management Practice. This Code covers multiple functional areas within Vista and is being sent to you to determine who in your organization can best comment. Regardless of who you choose they may not be able to comment on all aspects of the Code. Please provide comments on the areas you feel you have some control over.

I need comments back to me by August 15, so I can provide Vista comments to CMA by August 22.

The package includes multiple attachments. You should focus on the Code (Attachment I) and the Response Form (Attachment II). Comments are solicited on the Q & A document (Attachment III) and the Self-Evaluation Form (Attachment IV) but are not essential. The self-evaluation form is for review only, it does not need to be completed.

Please give me a call if you have questions on what's needed. Member company comments do have an impact so please give some time to this review.



T. G. Grumbles

dlj
.122

Attachment

Distribution: PLANT MANAGERS

R. W. Seymour-Aber, L. R. Bauer-Balt, G. D. Williams-Blane, J. Pavao-Hmd, J. Friend-LCCP, J. W. Ware-LCLAB, R. A. Conrad-LCVCM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

Paul Gowan

CTIRP COMMITTEE

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

cc: T. H. Huffman, J. A. DeBernardi, G. G. Draper, R. D. Gamblin

VVV 000013284



CHEMICAL MANUFACTURERS ASSOCIATION

June 26, 1990

Robert A. Roland
President

Mr. Thomas G. Grumbles
Environmental Quality Manager
Vista Chemical Company
900 Threadneedle
Houston, Texas 77079

Dear Mr. Grumbles:

Re: Responsible Care: Draft Distribution Code of Management Practices, Member Company Response Form and Typical Questions Associated With the Distribution Code

The draft Distribution Code of Management Practices is enclosed for your review (Attachment I). This Code was prepared by an ad hoc group of the Distribution Committee representing a broad range of member companies (roster of companies attached).

Please review the draft code and provide your written comments to CMA by August 22, 1990. A response form (Attachment II) is enclosed for your comments.

The Distribution Code of Management Practices seeks to reduce the risk of harm posed by the distribution of chemicals to the general public; to carriers, contractor and chemical industry employees; and to the environment. As stated in the Purpose and Scope section of the draft Code, adherence will lead to continually safer chemical distribution and help member companies:

- o evaluate the risks associated with chemical distribution and methods to reduce those risks;
- o meet or exceed all regulations and industry standards governing chemical distribution; and
- o develop new technologies to improve chemical distribution safety.

The Code will also promote improvements in:

- o the safety performance of carriers and other providers of distribution services;

VVV 000013285

June 26, 1990

Page 2

- o the public's preparedness in responding to chemical distribution emergencies; and
- o the public's understanding of, and confidence in, industry efforts to improve chemical distribution safety.

Implementation of the Code as an obligation of membership under Responsible Care will require the commitment of significant resources by both CMA and its member companies. Implementation will be supported by many of the existing CMA Distribution and National Chemical Response and Information Center resources, as well as by a set of implementation aids being prepared by the CMA Distribution Committee. With this in mind, I urge that the Code be reviewed by all those responsible for its implementation.

Earlier drafts of the Code were reviewed by the Responsible Care Public Advisory Panel, and by those Responsible Care Coordinators who attended the first coordinators conference last June. This draft reflects the advice and comments we received from these groups, as well as from those CMA member company representatives who attended the four open workshops sponsored by the Distribution Committee, the Code Drafting Group, and participants on the task groups responsible for developing portions of the Code.

In order to help focus your company's review of the draft Distribution Code of Management Practices, we have enclosed a question and answer document (Attachment III). This document addresses several key issues raised about the Distribution Code during its development. Since the final code will be accompanied by a similar document to facilitate the implementation process, we would appreciate your comments on this.

Additionally, one of the key elements of the Distribution Code is member company self evaluations. These evaluations will provide you with information about the stages of implementation that segments of your company have achieved. They are also important in developing a composite of where the industry stands in satisfying the principles of Responsible Care. Please look over the self-evaluation form (Attachment IV), and provide us with your comments.

We plan to conduct a preliminary review of the Distribution Code with the CMA Board of Directors in September, and will seek their approval in November, 1990. In preparation for these reviews, we want to ensure that all CMA member companies have an adequate opportunity to review the Code and provide comments. Please complete the Response Form (Attachment II), and return it along with any additional comments your company has about the Code to: Mr. Mike Heimowitz, Manager, Distribution Safety Program, Chemical Manufacturers Association, 2501 M Street, N.W., Washington, D.C. 20037, by August 22, 1990. If your company has no comments on the draft Code, please check the first box and send it back to Mr. Heimowitz at CMA Headquarters. Questions about the Code should be directed through Dr. Lori Ramonas of CMA at (202) 887-1264.

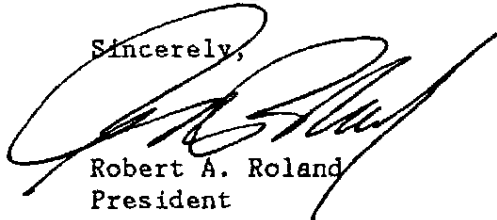
VVV 000013286

June 26, 1990
Page 3

The Distribution Code drafting group will review and consider all comments received by this date in preparing for the September presentation to the CMA Board of Directors, and for the Board's final approval in November. This will provide the Code drafting group the opportunity to consider your views when making its final revisions to the Distribution Code.

We are pleased with the progress that has been made on this Distribution Code of Management Practices. Thanks to the efforts of a broad spectrum of CMA member companies, the Distribution Code provides a comprehensive blueprint for improving chemical distribution safety. The Code also responds to a number of the public's safety concerns. Our ability to gain the public's trust is dependent on the successful implementation of this Code and Responsible Care as a whole. Although additional resources will be necessary in the short term, Responsible Care and the Distribution Code are good business in the long run.

Sincerely,



Robert A. Roland
President

Enclosures

cc: Executive Contacts
Distribution Contacts
Responsible Care Coordinating Group Members

VVV 000013287

Distribution Code (Draft 5/11/90) Page 1

DISTRIBUTION CODE OF MANAGEMENT PRACTICES

PURPOSE AND SCOPE

The Distribution Code of Management Practices seeks to reduce the risk of harm posed by the distribution of chemicals to the general public; to carrier, contractor and chemical industry employees, and to the environment. Adherence to the code will lead to continually safer chemical distribution and help member companies:

- o evaluate the risks associated with chemical distribution and methods to reduce those risks;
- o meet or exceed all regulations and industry standards governing chemical distribution;
- o provide emergency advice or assistance to people on the scene in the event of a chemical distribution accident or release;
- o develop new technologies to improve chemical distribution safety.

The code will also promote improvements in:

- o the safety performance of carriers and other providers of distribution services;
- o the public's preparedness in responding to chemical distribution emergencies;
- o the public's understanding of, and confidence in, industry efforts to improve chemical distribution safety.

The Distribution Code of Management Practices applies to all modes of transportation (highway, rail, marine, air and pipeline) and to the shipment of all chemicals, including chemical waste. The code also applies to distribution activities (storage, transfer and repackaging) occurring while chemicals are in transit between member companies and their suppliers and customers.

RELATIONSHIP TO RESPONSIBLE CARE GUIDING PRINCIPLES

This code helps achieve several Responsible Care Guiding Principles:

- o to recognize and respond to community concerns about chemicals and our operations;
- o to make health, safety and environmental considerations a priority in our planning for all existing and new products and processes;
- o to counsel customers on the safe use, transportation, and disposal of chemicals;

- o to operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public;
- o to participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment;
- o to promote the principles and practices of Responsible Care by sharing experiences and offering assistance to others who produce, handle, use, transport or dispose of chemicals.

MANAGEMENT PRACTICES

Each member company shall have an ongoing chemical distribution safety program that includes:

1. Risk Management

- 1.1 Senior management commitment through policy, communications and resources to ongoing improvements in chemical distribution safety.
- 1.2 Regular evaluations of chemical distribution risks that consider the hazards of the material, the likelihood of accidents or releases, the potential for human and environmental exposure from release of the material, and the route of transport.
- 1.3 Identification and implementation of risk reduction measures for chemical distribution.
- 1.4 Reporting and investigation of chemical distribution accidents and releases, and implementation of preventive measures.

2. Compliance Review and Training

- 2.1 A process for monitoring changes in, and interpretations of, regulations and industry standards for their applicability to member company chemical distribution activities, and for implementing those regulations.
- 2.2 Training for all affected member company employees in the proper implementation of applicable regulations and member company requirements.
- 2.3 An ongoing program for providing guidance and information to carriers and contractors who perform distribution activities for the member company on the member company's training and compliance requirements for the activities.

- 2.4 Regular reviews of member company employee, and carrier and contractor compliance with applicable regulations and member company requirements.

3. Carrier Safety Fitness

- 3.1 A process for selecting carriers to transport chemicals that emphasizes carrier safety fitness and regulatory compliance, and includes regular reviews of their performance and compliance.
- 3.2 Regular evaluation of customer and supplier programs for qualifying the carriers selected to transport chemicals to and from member company facilities to ensure that such programs include safety fitness criteria.
- 3.3 Feedback to carriers on their safety performance and suggestions for improvement.

4. Handling and Storage

- 4.1 Documented procedures for ensuring that containers are appropriate for the chemical being shipped by the member company, comply with testing and certification requirements and are free of leaks and visible defects.
- 4.2 Documented procedures for loading chemicals at member company facilities that will reduce emissions to the environment, protect loading personnel and provide securement of the load during transit.
- 4.3 Documented procedures for unloading chemicals at member company facilities that will reduce emissions to the environment, protect unloading personnel, and ensure that chemicals are unloaded into proper storage facilities.
- 4.4 Criteria for the cleaning and return of tank cars, tank trucks, and returnable bulk and semi-bulk containers, and for the disposal of cleaning residues.
- 4.5 An ongoing program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing member company chemicals.
- 4.6 A process for selecting facilities and sites that store or handle chemicals in transit that emphasizes safety fitness and includes regular reviews of such fitness.

5. Emergency Response and Public Preparedness

- 5.1 A process for responding to chemical distribution accidents and releases involving member company chemicals.

- 5.2 Documented procedures for making emergency response information about member company chemicals in distribution available to response agencies.
- 5.3 An ongoing program for making training facilities and materials available to emergency response agencies.
- 5.4 Dialogue with state and local emergency planning organizations on the distribution and hazards of the member company's chemicals to improve community preparedness to respond to chemical distribution emergencies.
- 5.5 Dialogue with the public on actions taken by the industry and the member company to improve the safety of chemical distribution and the effectiveness of sound emergency response assistance.

Member Self Evaluation

Member companies shall report annually the stage of implementation of each management practice in this code to an agent designated by the Chemical Manufacturers Association. The application of each practice to each mode of transportation and distribution activity will vary with both the risk posed by the distribution of the chemical and the characteristics of the mode of transportation.

Relationship to Other Codes of Management Practice

This Code complements, and should be implemented in conjunction with, current and future Codes of Management Practices.

RETURN BY AUGUST 22, 1990 TO:
Mr. Mike Heimowitz
CMA Distribution Division
2501 M Street, N.W.
Washington, D. C. 20037

ATTACHMENT II

DISTRIBUTION
CODE OF MANAGEMENT PRACTICES
RESPONSE FORM

WE HAVE REVIEWED THE DISTRIBUTION CODE OF MANAGEMENT PRACTICES AND HAVE
NO COMMENTS () (CHECK ONLY IF NO OTHER COMMENTS ARE PROVIDED)

1. Is the purpose clearly defined? Please explain. _____

2. Does the purpose clearly convey that the Distribution Code covers
more than just transportation? _____

3. The Code is designed to achieve continual improvements in chemical
distribution safety. Is this an appropriate goal? _____

4. Throughout the Code, we have tried to differentiate between activi-
ties, actions and results that you can directly affect versus
those that you can only affect indirectly, if at all. The manage-
ment practices primarily cover the former activities -- those you
can control. Have we done an adequate job in maintaining the
differentiation? Please explain. _____

5. Overall, does the Code clearly convey the need to establish a
dialogue between chemical distribution professionals and the
community? _____

6. Do you feel parts of the Code are redundant? If so, which parts?

VVV 000013292

7. Do you feel the member evaluation form will be useful to monitor and evaluate your progress in implementing the Code? (Remember, one form will be submitted annually to an agent of CMA. The report will list the status of each of your company's plants on each aspect of the Distribution Code.) _____

8. Is there a need for and would you attend a workshop for RC coordinators on self evaluation and implementation of the Code? _____

9. Should the Distribution Contacts also attend? _____
10. Should the Code be expanded? Is so, what should it include? _____

11. Is the Code sufficiently flexible and realistic for your company to implement the management practices in a way that takes into account current safety programs and organizational structure? _____

- If not, how would you propose the Code be changed? _____

12. How long do you think it will take your company to reach Stage VI on all Code elements? _____

13. What additional resources do you think you will need to implement this Code (both internal and external)? _____

- If these resources are made available, do you think the Code will be realistically achievable? _____

VVV 000013293

14. Will the implementation of this Code result in continual improvement in performance in each of the management practice areas?

15. Do you have any other comments regarding the Code and its implementation?

Company: _____

Responsible Care Coordinator: _____

VVV 000013294

**DISTRIBUTION CODE OF MANAGEMENT PRACTICES
QUESTIONS AND ANSWERS**

1. **Is this a non-growth Code? Or can the Code accommodate increases in the volume of material shipped and received?**

Answer: This Code envisions long-term improvements in chemical distribution safety. The method of achieving improvements is left to the needs of the individual member companies. Any plan for safety improvements must also accommodate expansions in distribution activities. The management practices set forth in the Code apply regardless of volume.

2. **If all of the chemical industry is to be affected, how do we ensure fair and equitable implementation?**

Answer: The Distribution Code is predicated on making safety improvements that are economically and technically sound. The Code does not require member companies to implement the Code in any particular way, but rather gives them the flexibility to implement the Code in a way that makes sense for that company, in view of its structure and current safety programs.

3. **Will this Code have a significant economic impact on my distribution costs?**

Answer: Safer chemical distribution may or may not have a higher price tag. The cost savings from reduction in accident frequencies may outweigh any additional costs of safety improvements. Safer chemical distribution may reduce the probability of costly additional regulations. Like other quality improvements safety improvements will over the long term result in lower total distribution costs.

4. **How will I get the additional resources to implement this Code?**

Answer: Member company CEO's are committed to the Responsible Care program. The Distribution Code, and other codes, reinforce the need for senior management commitment of resources to ensure implementation of the Code. There is enough flexibility in the implementation of the Code to allow for priority setting and resource allocation. Our goal is long term improvement allowing for a managed allocation of resources.

5. Does this Code represent a shift in responsibility between shippers and carriers, or increase my company's potential liability?

Answer: The Code does not affect the responsibility of carriers and storage facilities to perform their distribution-related activities carefully. However, the Code does require shippers to have a greater awareness of those activities and the safety fitness of the parties performing them. The liability implications of this greater involvement in upstream and downstream distribution activities will depend on the circumstances in which the liability question arises. If implemented in good faith, the Code may well reduce a company's potential liability exposure, because the risk of accidents will be reduced. In addition, companies will be able to point to their implementation of the Code as an example of their commitment to safety and exercise of responsible and reasonable care.

6. How can I get carriers and others to cooperate with me in improving chemical distribution safety?

Answer: Carriers and other providers of distribution services have all participated, in some form, in the development of the Code and other materials. They support our efforts and recognize the importance of improving the safety of chemical distribution. Many of these industries are exploring the development of their own Responsible Care programs. Quality carriers welcome the Code's requirement for reviews of carrier safety fitness, and consider the safety review process, and the shipper-carrier cooperation it entails, to be a business opportunity. Certainly, the public views carrier safety fitness and the consideration of such fitness in carrier selection as an important part of the Code.

7. How can I judge the quality of our existing programs?

Answer: A comprehensive set of implementation aids are being developed that will assist you. The aids will be developed and reviewed by experts from a variety of member companies, and in some cases reflect programs for each code element. The aids will provide a checklist for you to use in designing new programs or evaluating existing programs.

8. Will my marketing department support the Code in efforts to influence customers?

Answer: The Distribution Code is not a stand alone Code. Other codes are under development, i.e., Product Stewardship, that will require marketing involvement and support. The public views our efforts to encourage and support customer implementation of safer practices as a very important part of our Code. You cannot expect immediate changes in traditional relationships. In the long term, working with our customers to improve safety will be a regular and accepted part of our business.

VVV 000013296

9. **What operations does this Code apply to? Does it apply domestically or world wide?**

Answer: The principles behind the Code are universal in concept. The improvement of chemical distribution safety is good business and good corporate citizenship. However, for purposes of CMA eligibility requirements, the Code applies to that portion of a corporation or company that is used to determine CMA dues. The principles in the Code represent responsible corporate behavior and should be encouraged throughout an organization.

10. **Does this Code apply to all chemical products or to only hazardous materials?**

Answer: The Code is designed to apply to all chemical products shipped by your company, not just those classified as hazardous by DOT. Chemical wastes are also covered by the Code. However, the way in which the management practices are implemented may depend in part on the hazards and volume of the material being shipped, and other variables.

11. **Are the Management Practices listed in the specific order of importance or implementation?**

Answer: No. The Management Practices are laid out in a logical pattern to achieve the goals of the Code. Your implementation strategy will depend on your own self evaluation of your current program. Priorities should be given to elements where you believe you are weakest and where your potential exposure is highest, and in response to changing public concerns, regulations and industry practices.

12. **Are my products shipped from distributors covered under the Code?**

Answer: The intent is to treat a distributor as a customer. This implies sale and resale of your product. If, however, your arrangement with a distributor is something other than a sale and resale transaction, i.e., distributed on consignment, the distributor would fall into the category of a provider of distribution services and those operations would be covered under this Code.

ATTACHMENT IV

RESPONSIBLE CARE
DISTRIBUTION CODE OF MANAGEMENT PRACTICE
DRAFT
SELF-EVALUATION

1. The purpose of these self evaluation forms are to: first, help your company identify where additional focus is necessary to carry out the Distribution Code, and second, to allow you to compare how your company matches up against the overall CMA membership. All responses sent to an agent of CMA will be aggregated, and the identity of the companies submitting information will be removed.
2. The stages of implementation are:

Stage I - No Action

Stage II - Evaluating company practices against Code practice

Stage III - Developing action plan to implement Code practice

Stage IV - Implementing action plan

Stage V - Management practice in place

Stage VI - Implementation reviewed and reaffirmed this year.
3. The self-evaluation forms are to be submitted annually to an agent of CMA. One form, signed by the Responsible Care Coordinator, will be furnished. The information filled in on category should reflect the stage of implementation for each of your company's affected plants. For example, if your company has 25 plants that are subject to the provisions of the Distribution Code you would identify the stages of implementation of all 25 plants for each category. So 1.2 may look like this:

STAGES

	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	<u>V</u>
1.2 Regular evaluations of chemical distribution risks that consider the hazards of the material, the likelihood of accidents or releases, the potential for human and environmental exposure from release of the material, and the route of transport.	14	3		5	3	

VVV 000013298

STAGES

<u>Risk Management</u>	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	<u>VI</u>
1.1 Senior management commitment through policy, communications and resources to ongoing improvements in chemical distribution safety.						
1.2 Regular evaluations of chemical distribution risks that consider the hazards of the material, the likelihood of accidents or releases, the potential for human and environmental exposure from release of the material, and the route of transport.						
1.3 Identification and implementation of risk reduction measures for chemical distribution.						
1.4 Reporting and investigation of chemical distribution accidents and releases, and implementation of preventive measures.						
<u>Compliance Review and Training</u>	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	<u>VI</u>
A process for monitoring changes in, and interpretations of, regulations and industry standards for their applicability to member company chemical distribution activities, and for implementing those regulation.						
2.2 Training for all affected member company employees in the proper implementation of applicable regulations and member company requirements.						
2.3 An ongoing program for providing guidance and information to carriers and contractors who perform distribution activities for the member company on the member company's training and compliance requirements for the activities.						
2.4 Regular reviews of member company employee, and carrier and contractor compliance with applicable regulations and member company requirements.						
<u>Carrier Safety Fitness</u>	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	<u>VI</u>
1 A process for selecting carriers to transport member company chemicals that emphasizes carrier safety performance and regulatory compliance, and includes regular reviews of their performance and compliance.						

VVV 000013299

- 3.2 Regular evaluation of customer and supplier programs for qualifying the carriers selected to transport chemicals to and from member company facilities to ensure that such programs include safety fitness criteria.
- 3.3 Feedback to carriers on their safety performance and suggestions for improvement.

<u>Handling and Storage</u>	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	<u>VI</u>
-----------------------------	----------	-----------	------------	-----------	----------	-----------

- 4.1 Documented procedures for ensuring that containers are appropriate for the chemical being shipped by the member company, comply with testing and certification requirements and are free of leaks and visible defects.
- 4.2 Documented procedures for loading chemicals at member company facilities that will reduce emissions to the environment, protect loading personnel and provide securement of the load during transit.
- 4.3 Documented procedures for unloading chemicals at member company facilities that will reduce emissions to the environment, protect unloading personnel, and ensure that chemicals are unloaded into proper storage facilities.
- 4.4 Criteria for the cleaning and return of tank cars, tank trucks, and returnable bulk and semi-bulk containers, and for the disposal of cleaning residues.
- 4.5 An ongoing program for providing guidance and information to customers, distributors, and other receivers on proper procedures for unloading and storing member company chemicals.
- 4.6 A process for selecting facilities and sites that store or handle member company chemicals in transit that emphasizes safety fitness and includes regular reviews of such fitness.

Emergency Response and Public Preparedness

I II III IV V VI

- 5.1 A process for responding to chemical distribution accidents and releases involving member company chemicals.
- 5.2 Documented procedures for making emergency response information about member company chemicals in distribution available to response agencies.
- 5.3 An ongoing program for making training facilities and materials available to emergency response agencies.
- 5.4 Dialogue with state and local emergency planning organizations on the distribution and hazards of the member company's chemicals to improve community preparedness to respond to chemical distribution emergencies.
- 5.5 Dialogue with the public on actions taken by the industry and the member company to improve the safety of chemical distribution and the effectiveness of sound emergency response assistance.

VVV 000013301

COMPANIES PARTICIPATING ON THE
RESPONSIBLE CARE DISTRIBUTION CODE DRAFTING GROUP

American Cyanamid Company
Chemicals Group
One Cyanamid Plaza
Wayne, NJ 07470

Arco Chemical Company
3801 West Chester Pike
Newtown Square, PA 19073

BF Goodrich Company
6100 Oak Tree Boulevard
Cleveland, OH 44131

Chevron Chemical Company
P.O. Box 5048
6001 Bollinger Canyon Road
San Ramon, CA 94583-0948

CIBA-GEIGY Corporation
7 Skyline Drive
Hawthorne, NY 10532

Dow Chemical USA
2020 Willard H. Dow Center
Midland, MI 48674

E.I. du Pont de Nemours & Company
M & L Department - B-8342-2
Wilmington, DE 19898

Eastman Chemical Company
P.O. Box 1990
Kingsport, TN 37662

Ethyl Corporation
451 Florida Street
Baton Rouge, LA 70801

W. R. Grace & Company
P.O. Box 24999
Greenville, SC 29616
803-281-2660

VVV 000013302

Hoechst Celanese Corporation
P.O. Box 569320
Dallas, TX 75356-9320

S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011

The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe, OH 44092-2298

Mallinckrodt, Inc.
675 McDonnell Boulevard
St. Louis, MO 63134

Mobil Chemical Company
P.O. Box 1028
Princeton, NJ 08540

Monsanto Chemical Company
800 N. Lindbergh Boulevard
St. Louis, MO 63167

Occidental Chemical Corporation
P.O. Box 809050
Dallas, TX 75380

PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272

Rohm and Haas Company
Independence Mall West
Philadelphia, PA 19105

Shell Oil Company
One Shell Plaza
Houston, TX 77001

Sherex Chemical
P.O. Box 646
Dublin, OH 43017

Texaco Chemical Company
P. O. Box 27712
Houston, TX 77227-7712

Texas Eastman Company
P.O. Box 7444
Longview, TX 75607

VVV 000013303

Union Carbide Corporation
Section A-1
39 Old Ridgebury Road
Danbury, CT 06817-001

UNIVAR
801 Second Avenue
1600 Norton
Seattle, WA 98104

Unocal Chemical Company
1345 North Meacham Road
Schaumburg, IL 60196

VVV 000013304

Interoffice
Communication

TO: Distribution

~~IGG: JCL: FRI: MEE: AJO: RF~~

XF: Desk

FROM: T. G. Grumbles

DATE: July 13, 1990

SUBJ: PROCESS SAFETY/HAZOP PLANNING INFORMATION MEETING AGENDA

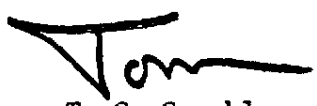
VISTA

AGENDA
FRIDAY, JULY 20, 1990
1:30-2:30
BOARDROOM

Objective: 1) Review Current and Developing needs in the
Process Safety/HAZOP Area

2) Introduce Current Plans and Needs Specific to
Budget Cycle

- | | |
|--|---------------|
| I. Problem Definition - What's driving/defining
our needs?
a. Regulatory
b. Other | TGG 10 min |
| II. Activity to Date
a. Hazops Done and Planned
b. What we've learned | VM 15 min |
| III. Current Planning Activities | VM 15 min |
| IV. "Most Immediate" Needs | VM/TGG 10 min |
| V. Discussion | ALL |


T. G. Grumbles

dlj
.127

Distribution: R. D. Gamblin, R. T. Ferrell, G. W. Inbody, R.
Gerlach, J. Stoner, J. DeBernardi, T. Huffman

cc: V. Messick

VVV 000013305

FOG: JCL: ~~REV~~: ~~MMH~~: AJO: RF
XF: Desk

TO: Distribution

FROM: T. G. Grumbles

DATE: July 13, 1990

SUBJ: JULY 20 ENVIRONMENTAL SEMINAR AGENDA

Interoffice
Communication

VISTA

ENVIRONMENTAL SEMINAR AGENDA

JULY 20, 1990

9:00-11:00

BOARDROOM - ASHFORD VII

Objective: 1) Review Basic Principles of Risk Assessment
2) Discuss Application of Risk Assessment
Principles to Regulatory Developments

- | | |
|--|--------|
| 1. Introduction | TGG |
| 2. Definition of Risk Assessment | DP |
| 3. The Four Phases of Risk Assessment | DP |
| a. Hazard Identification | |
| b. Dose-Response (Potency) | |
| c. Exposure Assessment | |
| d. Risk Characterization | |
| 4. Uncertainties in Risk Assessment | DP |
| 5. Acceptable Risk Determinations | DP |
| 6. Regulatory Application Vista Examples | DP/TGG |
| 7. Discussion | ALL |


T. G. Grumbles

dlj
.123

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-Houston

V. W. Weiss-Austin

cc: D. Penney

VVV 000013306