

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079-2990
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224-9029
Fax (713) 588-3236

March 5, 1991

TGG: JCL: ERT: MUI: AJO: RF

XF: _____

VISTA

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert M. Akin
Vice President-Petro Chemicals
E. I. Dupont De Nemours & Company
1007 Market Street, Suite N6404
Wilmington, Delaware 19898

Mr. C. H. Lee
Executive Vice-President
Refining, Marketing, Supply & Transportation
Conoco, Inc.
P. O. Box 2197
Houston, TX 77252

Gentlemen:

Pursuant to §15.1, §15.5, and §12.5 of the Asset Purchase Agreement letters dated July 20, 1984, between E. I. Dupont de Nemours & Company, Conoco, Inc., and Vista Chemical Company (Vista), we hereby provide notice of recently-discovered information that may lead to the filing of an Environmental Claim.

Vista just received the final Hazardous Waste Permit for the Lake Charles Chemical Complex. This permit contains the HSWA portions that we notified you about in a January 10 notice letter. The additional provisions of the permit also contain information that may give rise to an environmental liability. We are coordinating our activities on this matter with Jay Christopher of the Conoco SHEA Department in Houston. A copy of the full permit is attached.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

Enclosure

cc: N. C. Frost
S. Olsen
J. Christopher
M. Hayes

VVV 000006036

Vista Chemical Company

900 Threadneedle
Houston, Texas 77079-2990
(713) 588-3000

P.O. Box 19029
Houston, Texas 77224-9029
Fax (713) 588-3236

March 5, 1991

TGC ~~XL~~: ERT: MUR: AIO: RF

XF: 15

VISTA

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Robert M. Akin
Vice President-Petro Chemicals
E. I. Dupont De Nemours & Company
1007 Market Street, Suite N6404
Wilmington, Delaware 19898

Mr. C. H. Lee
Executive Vice-President
Refining, Marketing, Supply & Transportation
Conoco, Inc.
P. O. Box 2197
Houston, TX 77252

Gentlemen:

Pursuant to §15.1, §15.5, and §12.5 of the Asset Purchase Agreement letters dated July 20, 1984, between E. I. Dupont de Nemours & Company, Conoco, Inc., and Vista Chemical Company (Vista), we hereby provide notice of recently-discovered information that may lead to the filing of an Environmental Claim.

Vista just received the final Hazardous Waste Permit for the Lake Charles Chemical Complex. This permit contains the HSWA portions that we notified you about in a January 10 notice letter. The additional provisions of the permit also contain information that may give rise to an environmental liability. We are coordinating our activities on this matter with Jay Christopher of the Conoco SHEA Department in Houston. A copy of the full permit is attached.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

dlj

Enclosure

cc: N. C. Frost
S. Olsen
J. Christopher
M. Hayes

VVV 000006037

TGG: JGL FRC 11/11/91
XF: none

TO: Distribution

FROM: T. G. Grumbles

DATE: March 5, 1991

Interoffice
Communication

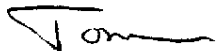
SUBJ: RATIONALE FOR MANUFACTURING HEALTH AND SAFETY POLICY
CHANGES

VISTA

Below is a summary of the discussions and rationale for the changes made to the policy during our meeting on February 28. The numbers below correspond to numbers on the attached policy.

1. This change clearly states, early in the policy, that employees are expected to "participate" as well as expect the items stated. This principle is stated later but it was felt necessary to state it early in the policy.
2. This change was made to lessen the possible concerns over a "we" and "they" attitude, or "hourly vs. management" attitude that might develop if expectations of both weren't clearly stated. This language is less inflammatory and still indicated management has a clear role.
3. "Occupational" is added for consistency.
4. There is still concern over the perception and practicality of the "number one" statement. However, no change is made with the recognition that the context of this statement must be addressed in employee communications regarding the policy.
5. This was minor wordsmithing.
6. This element was changed to more clearly indicate the property loss intent.
7. This change was made to make it clear that development of new programs as well as maintenance, or improvement of existing programs was included.
8. This element was revised to more clearly state the intent and responsibilities of all involved.

How to communicate the policy was discussed. It was felt that plant managers must communicate it downward through natural teams, etc., similar to the introduction of the environmental policy last spring.


T. G. Grumbles

ajo
TGG.015

DISTRIBUTION:

K. Fogg, R. Gantz, G. Shirley, B. White, M. Lunsford, B. Trego, M. Tonkovich,
T. Huffman

VVV 000006038

February 28, 1991

VISTA CHEMICAL COMPANY

③ Manufacturing Department Occupational Safety & Health Policy ①

It is the Manufacturing Department's policy that Vista employees and all authorized personnel entering onto the premises of Vista's manufacturing locations should expect and actively participate in achieving a safe and healthful work environment. It is our objective to work toward the elimination of the potential for personal injury, work related illness, loss of life or property damage that could occur within our facilities, as well as preventing or minimizing the impact of any incidents within our facilities that could affect the safety and health of the surrounding communities.

② In order to accomplish this objective, manufacturing personnel at all levels will adhere to the following principles:

- ③ ④ Maintain occupational safety and health as a number one priority.
- ▶ Actively participate in and support the safety and health programs established at each worksite.
- ▶ Comply with all Company safety and health procedures and practices.
- ▶ Be aware of and take action to assure compliance with the various regulatory provisions related to safety and health.
- ▶ Take personal responsibility for individual safety and the safety of fellow employees, contractors, visitors and neighbors.
- ▶ Assure that safety and health planning are made an integral part of accomplishing each job task.
- ⑤ ▶ Take actions and/or make constructive suggestions to eliminate physical hazards and unsafe work procedures and practices from the work environment.
- ▶ ⑥ Develop and maintain programs to protect company assets from accidental loss.
- ▶ Include safety and health issues as essential and integral parts of process and facility designs and construction.
- ▶ ⑦ Develop, maintain and participate in training programs to assure understanding of safety and health procedures and practices.
- ▶ ⑧ Develop, maintain and participate in annual Safety and Health Audits at each location and support necessary program changes from these audits.

VVV 000006039