

Interoffice
Communication

TO: Distribution

TOG: JCL: ~~REP~~ MJH: AJO: RF
XF: none

FROM: T. G. Grumbles
DATE: February 22, 1990

VISTA

SUBJ: RESPONSIBLE CARE\ENVIRONMENTAL POLICY COMMUNICATIONS

As promised enclosed are the materials for conducting your communication meetings. The basic goal is to complete these efforts by April 1 to assure our employees are informed of our activities prior to CMA's national communication efforts and expected earth day activities.

Enclosed are the following:

1. Copies of the script
2. Overheads (including a hard copy)
3. Feedback cards to be used to start the sessions and at the end
4. Instructions on use of the feedback cards

Please call me or Mike Reynolds if you have further questions at this time.

Tom

T. G. Grumbles

dlj
.1014

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-LCVM, H. D. Garrison-Okc, P. L. Foote-Prem, V. W. Weiss-Austin

cc: w/o attachments
T. H. Huffman, J. A. DeBernardi, R. D. Gamblin

VVV 000011184

**Interoffice
Communication**

TO: R. D. Gamblin

FROM: T. G. Grumbles

DATE: February 23, 1990

SUBJ: PROGRESS REPORT

VISTA

1. TGG conducted product liability training sessions with the Legal Department for the BCDP Group, Engineering, and R&D.
2. TGG participated in a meeting of the Vista Product Safety Assessment Group. Activities covered included a review of current and future ethoxylate product testing needs, toxicity data documentation, storage and retrieval, and finalization of a revised group charter and working guidelines.
3. Final support packages for Responsible CARE/Environmental Policy communications were distributed this week.
4. A presentation was given to Management on the Clean Water Act and its implications for Vista.
5. Advised LCCP on the applicability of the fugitive emission New Source Performance Standard to the Ethylene Unit.
6. The PVC Drug Master File was revised and submitted to the Food and Drug Administration.
7. The Toxicity Characteristic (TC) is likely to be promulgated in March. Pressure from an environmentalist group, the Environmental Defense Fund, appears to be effective in pushing EPA to publish the final rule. If TC is promulgated in early March, it would become effective in early September.
8. ERT assisted S&T with quality vendor audit at GATX.
9. A visit to Hammond was made to do an assessment of their environmental programs. Preliminary assessment shows no major deficiencies. We will be working with the plant to identify areas of improvement.
10. MJH is working with Ex-Plant Operations and Customer Service to insure proper non-bulk labeling at all ex-plant packagers.
11. MJH developed response to conclusions from a recent International Labor Organization Conference on chemical safety/hazard communication for CMA. CMA is developing an industry response for OSHA.
12. Bilingual Canadian WHMIS labels were produced and sent to Witco. We are working on the development of WHMIS MSDS's for Canadian customers.

T. G. Grumbles

T. G. Grumbles

dlj

VVV 000011185

EXHIBIT A

December 1, 1989

CHEMICAL MANUFACTURERS ASSOCIATION
MEMBER SELF-EVALUATION FORM
COMMUNITY AWARENESS AND EMERGENCY RESPONSE
CODE OF MANAGEMENT PRACTICES

Member Company:

Name: VISTA CHEMICAL

Responsible Care Coordinator:

Name: THOMAS G. GRUMBLES

Address: P.O. BOX 19029

HOUSTON, TEXAS 77224

Telephone: (713) 588-3445

Number of facilities subject to Code 10

*done 3-8-90
MLG*

Mail to

Dr. Edward J Heinen

Heinen Associates, Inc.

*1815 H Street, NW, Suite 201
WASHINGTON, D.C. 20006*

VVV 000011186

Community Awareness	<u>STAGES</u>			
	I	II	III	IV
1. An ongoing assessment of employee concerns and questions about the facility.	1	1	1	7
2. Communications training for key facility and company personnel who will communicate with employees and the public concerning safety, health and environmental issues.	1	1	2	6
3. Education of employees about the facility's emergency response plan and safety, health and environmental programs.	1	1	2	6
4. An ongoing dialogue with employees to respond to their questions and concerns and involve them in community outreach efforts.	3	3	1	3
5. Ongoing assessment of community questions and concerns about the facility.	7	1		2
6. An outreach program to educate responders, government officials, the media, other businesses and the community of the facility's emergency response program and risks to the community associated with the facility.	3	3	1	3
7. A continuing dialogue with local citizens to respond to questions and concerns about safety, health, and the environment, and to address other issues of interest to the community.	9			1
8. A policy of openness that provides convenient ways for interested persons to become familiar with the facility, its operations and products, and its efforts to protect safety, health and the environment.	5	2	1	2
9. A regular evaluation of the effectiveness of the ongoing employee and community communications efforts.	8	1		1

VVV 000011187

STAGES

Emergency Response	I	II	III	IV
1. An ongoing assessment of potential risks to employees and local communities resulting from accidents or other emergencies.	2	1	1	6
2. A current, written facility emergency response plan which addresses, among other things, communications and the recovery needs of the community after an emergency.	2	1		7
3. An ongoing training program for those employees who have response or communications responsibilities in the event of an emergency.	1		1	8
4. Emergency exercises, at least annually, to test operability of the written emergency response plan.	2	1	4	3
5. Communication of relevant and useful emergency response planning information to the Local Emergency Planning Committee.			3	7
6. Facility tours for all non-employee emergency responders.	5	1		4
7. Coordination of the written facility emergency response plan with the comprehensive community emergency response plan. If no plan exists, the facility should initiate efforts to create a plan.	4			6
8. Participation in the community emergency response planning process to develop and periodically test the comprehensive community emergency response plan developed by the Local Emergency Planning Committee.	4			6
9. Sharing of information and experience relating to emergency response planning, exercises, and the handling of incidents with other facilities in the community.	5		2	3

Notes: Please identify any specific problems and/or resources.

VVV 000011188

TO: Distribution

TGG: JCL: ERT: MJH: AJO: RF

XF

FROM: T. G. Grumbles

DATE: February 26, 1990

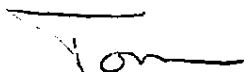
SUBJ: OSHA PROPOSED STANDARD FOR CADMIUM

Interoffice
Communication

VISTA

Based on the proposed standard and the significant reductions in the PEL, you should review all data you have for cadmium exposures. I need to know what personal sampling results we have for the last year.

Please give me a call to discuss your sampling and cadmium use in compounding.


T. G. Grumbles

dlj
.1016

Distribution: B. Trego-Aber, G. Lipps-Prem, H. Peirce-Blane, R.
Martin-Austin

VVV 000011189

Vista Chemical Company

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

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

February 26, 1990

TGG: JOL: EPH: MJP: AJO: RF

XF: none

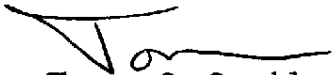
VISTA

Larry Kornreich, CIH
Director, Environment & Safety
ITT Corporation
320 Park Avenue
New York, NY 10022

Dear Larry:

In regards to Richard Waytko's fee increase proposal, I agree with increasing the exhibit space fee but I don't believe a registration fee increase is justified at this time. Until we increase the length, content, etc. of the conference I think we should keep the fee at \$110. I'm not a "hard-liner" on this, but I can't think of justification at this time if asked by a member.

Sincerely,



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

dlj

VVV 000011190