

Vista Chemical Company

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XF: _____

VISTA

March 18, 1991

Ms. Sandra L. Tirey
Associate Director, Health Programs
CMA
2501 M Street N. W.
Washington, D. C. 20037

Dear Sandra:

Below are Vista's comments on the draft Employee Health and Safety Code. These are in addition to those provided at the March 7th workshop in Atlanta.

Management Practice 1 - The "published policies" wording should be revised to "published policy statements" or something similar to make it clear that these principles can be part of a broader policy. A specific policy for health and safety should not be specifically required.

Management Practice 2 - The word "maintained" should be deleted.

Management Practice 3 - It may be implied but I would suggest adding words regarding "compliance with applicable regulations" as well. Health and safety programs could be effective but non-compliant in some areas.

Management Practice 4 - No comments except that this element will be difficult to self-assess. It is not clear what specific activities are anticipated here. Specific guidance in the implementation guide or word modifications in the element are needed to help here.

Management Practice 5 - This element is understandably controversial but needs work to clearly state the intention of this element and be practical from an implementation and "real-world" standpoint.

The intent should be to assure that the same degree of concern and protection that is given to company employees is given to contract or employees on our site, and that is done within the actual legal and employee relations constraints that exist for good reason. We cannot force all contractors to adopt the elements of this code. The words "applicable sections" help, but this is vague and will cause serious inconsistencies in company implementation.

This element must be reworded to address the objective, not specify how to do it.

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Management Practice 6 - Words should be added to specify or clarify what is being prioritized and why. It appears that hazards should be prioritized as to the need for correcting or addressing them, but this is not clear.

Management Practice 7 - It seems "workplace practices" should be added to this element.

Code Elements 8 and 9 - These elements seems duplicative and as written will be difficult to self-assess. Element 8 uses the word "occupational" but I suggest adding the words "related to workplace conditions" to assure the scope is clear.

Code Element 10 - It seems some words are missing. Isn't it the "results" of investigations that should be communicated.

Code Element 11 - The word "systems" implies more than one. This should be changed to "A system...".

Code Element 12 - No comment

Code Element 13 - No comment

Code Element 14 - The words "special hazard" are not very clear. This should be clarified.

Code Element 15 - Suggest adding "identified by investigations" after "and incidents".

Code Element 16 - The word "test" should be clarified to indicate this means verify working order as purchased, not "certification type" testing.

Code Element 17 - No comment

Code Element 18 - No comment

Code Element 19 - The word "reflect" should be changed to "that are consistent with".

Code Element 20 - No comment

Code Element 21 - This will be difficult to self assess as written. Suggest less words can be used to convey the same intent. The word "upgrade" is not clear as to it's meaning.

Code Element 22 - No comment

Code Element 23 - No comment

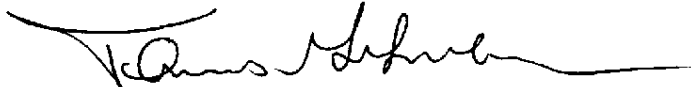
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Code Element 24 - No comment

General Comment: The words program, process, provision and plans are used throughout the code. If possible, where they are meant to convey the same thing, the same word or words should be used.

Sincerely,



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

dlj

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Chemical Manufacturers Association

RESPONSIBLE CARE
EMPLOYEE HEALTH AND SAFETY
CODE OF MANAGEMENT PRACTICES

Response Form

1. We have reviewed the Employee Health and Safety Code Management Practices and have no comments. _____
(Check only if no other comments are provided).
2. Will the practices outlined in this draft satisfy the goals of the Code described in the purpose section?

X YES _____ NO

If no, what changes would you recommend? _____

3. Are any practices redundant or unclear?

X YES _____ NO

If yes, please explain why and offer solutions. _____

elements 8 and 9 appear to be - should combine

elements 3 and 24 appear to be

4. Are any important issues left out of the code?

_____ YES X NO

If yes, please explain. _____

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5. What kinds of resources will you find helpful in implementing this Code?

Technical exchanges, or other methods of sharing specific implementation programs or aids would be helpful. Specifically health and safety auditing, and assessing training effectiveness programs or methods are needed.

6. Additional Comments...

Your Name:

Thomas G Grumbles

Company:

Vista Chemical

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PLEASE RETURN BY APRIL 1, 1991 TO:

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