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FROM: T. G. Grumbles
DATE: February 13, 1989

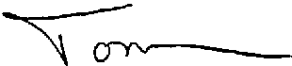
Interoffice
Communication

SUBJ: RESPONSIBLE CARE/VISTA ENVIRONMENTAL POLICY STATEMENT

VISTA

Attached are the handouts and overheads used during the subject meeting. Below are the highlights and action items from the meeting:

1. Vista has an obligation to communicate the content of the CMA Responsible Care Program to employees. We propose to do this by emphasizing that implementation of the Vista Environmental Policy Statement will allow Vista to meet the objectives of Responsible Care.
2. A copy of the Vista Environmental Policy Statement with revisions suggested at the meeting is attached. Most of the discussion at the meeting involved what pinpointed programs or effort would be needed to adhere to the principles listed. It was decided that the next step would be to have a middle management briefing to get consensus on the policy statement.
3. The proposed communication plan was generally approved. We will begin to work on the Management video.
4. Specific action items are as follows:
 - a. Revise Policy Statement and get a review of grammar etc. by PR - TGG
 - b. Begin to work on the video - TGG/MSR
 - c. Define concern with word "fully" preceding comply - TGG
 - d. Arrange for additional Management briefing meeting - ALL



T. G. Grumbles

dlj
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Attachment

Distribution: J. Burns, J. Ball, J. Weidner, N. Frost, R. Ferrell,
G. Draper, R. Gamblin, R. Dale

VVV 000006812

Guiding Principles for

RESPONSIBLE CARE

A Public Commitment

As a member of the Chemical Manufacturers Association, this company is committed to support a continuing effort to improve the industry's responsible management of chemicals. We pledge to manage our business according to these principles:

- To recognize and respond to community concerns about chemicals and our operations.
- To develop and produce chemicals that can be manufactured, transported, used and disposed of safely.
- To make health, safety and environmental considerations a priority in our planning for all existing and new products and processes.
- To report promptly to officials, employees, customers and the public, information on chemical-related health or environmental hazards and to recommend protective measures.
- To counsel customers on the safe use, transportation and disposal of chemical products.
- To operate our plants and facilities in a manner that protects the environment and the health and safety of our employees and the public.
- To extend knowledge by conducting or supporting research on the health, safety and environmental effects of our products, processes and waste materials.
- To work with others to resolve problems created by past handling and disposal of hazardous substances.
- To participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.
- 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.

RESPONSIBLE CARE

A Public Commitment

SUMMARY DESCRIPTION

Responsible Care Program Elements

The *Guiding Principles for Responsible Care of Chemicals* is a statement of commitment by each member company to fully support a continuous effort to improve the industry's responsible management of chemicals. Each member company will pledge to operate according to the principles statement and will sign to that effect. This signed statement will be considered an obligation of membership in CMA. These guiding principles are based on CMA's 1983 policy statement on health, safety and the environment and on the Canadian Responsible Care principles. They also incorporate guidance received from member company executive contacts.

Following association adoption of the guiding principles, various CMA committees will begin development of *Codes of Management Practices*. Each set of management practices will focus on a different concern. Impetus for developing an individual Code of Management Practices will come from either an industry belief that there exists a substantive need to take voluntary action or a substantial public concern to which the industry should be responsive, or both. Initially, code packages will be considered for CAER, transportation, release reduction and management, and plant operations. Based upon the implicit obligations of the guiding principles, the Codes of Management Practices will be designed by identifying expected management practices as objectives rather than prescribing any absolute or quantitative standard. Since the codes are intended to serve as objectives, they will complement any existing member company programs or practices that achieve the same goals. Responsible Care will therefore become an integral part of the existing company program, not a replacement or another duplicative overlay. Each Code of Management Practices will be approved by the board after the opportunity for comment by all member companies.

Another important element in the Responsible Care initiative is a *Public Advisory Panel*, which will be composed of a cross-section of environmental, health and safety thought leaders. The panel will be an industry (CMA) effort, not a company responsibility. It will be assembled and moderated by an experienced facilitator working at the association's direction and will serve to assist the industry in identifying and developing programs and actions that are responsive to public concerns and viewed as proactive by key policy groups. Meeting several times a year, the panel will review issues on which CMA requires comment and advice as well as to discuss subjects that panel members believe require industry response. The panel will critique (but not approve) all proposed Codes of Management Practices and is expected to provide early definition of public concerns involving the chemical industry. *Community Advisory Panels* at the local or regional level can serve companies and the industry in a similar manner. They will be called for as a milestone of a "CAER Code of Management Practices" and CMA will offer support to facilitate companies' formation and operation of these local panels.

Effective performance evaluation is a critical element of Responsible Care. *Member Company Self-Evaluations of Management Practices*, as well as compilation of quantitative results, will be necessary to meet three vital objectives. In order to build a collective record of tangible improvement in the responsible management of chemicals, specific management practice codes may call for CMA to collect and maintain *statistical trends* from data that members currently make available to governmental organizations. Details of quantitative trend statistics programs will be defined by task forces developing the respective management practice code package.

SUMMARY DESCRIPTION

(Continued)

Two additional objectives are served by Member Company Self-Evaluations of Management Practices. The first is to provide feedback from the membership on the value and relevance of codes of management practices and on any additional CMA support activities that may be needed. Second, such evaluations, along with quantitative trend data, will build CMA credibility and confidence on behalf of its members in dealing with government, the public and other external groups.

Each management practice code will contain definition of management practice "progress mileposts" that member companies will use to measure and evaluate their performance versus the commitment. Details of the member management practice evaluation program will be developed by a designated work group for the board of directors' consideration and approval. The work group will be requested to define the mechanics of a practical system based on member company self-evaluation of their progress. Evaluations will be coordinated through the member companies' executive contacts and will be designed to maximize the value to companies' efforts to improve their performance.

Due to their varying size and circumstances, member companies will not be expected to be at the same level of performance for each Code of Management Practices at the same time. However, it will be expected that each member company will be able to report continued progress.

To facilitate and support each member company's continual improvement in responsible management of chemicals, **Executive Leadership Groups** will be formed to provide an opportunity for executive contacts to periodically discuss progress and share experiences with each other that have been successful. These regional groups of ten to twenty executive contacts will meet several times a year to review Codes of Management Practices under development, discuss members' progress on existing codes, identify areas where individual companies need assistance from CMA or other companies, and to address other priority industry issues. Understandings developed during these meetings will be reviewed and acted on by the association's officers, executive committee and board of directors.

Endorsement of the Responsible Care initiative will be an **Obligation of Membership** in the association. Each member company's executive contact is expected to make a commitment to Responsible Care by:

- a) signing the Guiding Principles for Responsible Care of Chemicals statement;
- b) communicating the commitment to Responsible Care to employees; and
- c) instructing management to make good-faith efforts to implement the Codes of Management Practices, participate in the self-evaluation process, and meet the expectations of the Responsible Care Program.

A member company's obligation to Responsible Care applies to those segments of the company's operations included in the CMA dues base (CMA Definition of Chemical Sales).

Member companies are also expected to participate in the development of the codes and programs. The Codes of Management Practices are intended to include mileposts that provide a road map for responding to industry priorities and the public's concerns. Member companies are expected to make good-faith efforts to move up the milepost ladder and meet the expectations of the Responsible Care initiative.

In an extreme case, where a member company has consistently not conducted its operations in accordance with the guiding principles and program elements of Responsible Care, association representatives will meet with the member company's executive contact to seek the company's positive involvement in the program.

If this fails to produce a commitment to pursue the objectives of Responsible Care, the executive committee and board could take appropriate actions including the disassociation of the company from membership after due process requirements have been met.

DRAFT

VISTA CHEMICAL COMPANY ENVIRONMENTAL POLICY

Vista Chemical Company recognizes that it's activities in producing and transporting chemical products can potentially impact the environment and communities surrounding it's operating facilities. In recognition of this, the company will conduct it's activities in such a way as to effect prudent protection of public health and the environment. Accordingly, Vista is committed to the following principles.

1. Fully comply with all laws and regulations related to environmental quality and public health protection in all of it's activities.
2. Maintain an environmental quality assurance program to ensure that operations are in full compliance with company policies, ^{Procedures} governmental permit limitations, and regulatory requirements.
3. Strive to reduce waste generation in all media by pursuing source control technology and involving all employees in waste minimization efforts.
4. Assess the potential for emergencies involving chemical releases which would impact the environment and surrounding communities, and strive to reduce the potential for and impact of such events.

5. Inform and educate employees, surrounding communities, customers, carriers, contractors and government agencies of the health and environmental hazards of the chemicals it makes, uses and sells. These activities will involve recognizing and responding to community concerns regarding environmental issues.
6. Determine that each new or existing product can be made, used, handled and disposed of safely with ^{full attention to} ~~adequate~~ employee, environmental and public health protection.
7. To participate with the government and other parties in ^{developing} ~~creating~~ responsible laws, regulations and standards to protect the workplace, community, and environment.
8. Maintain an awareness of and sensitivity to environmental responsibility among all Vista employees through an ongoing program of information and education.
9. Consider safety and health, environmental control and waste minimization as an essential and integral part of new process and facility design and construction.
10. Continuously strive to reduce the risk to employees and neighbors posed by chemical substances used, produced, and transported ^{within our communities.} ~~by Company locations.~~

RESPONSIBLE CARE: A PUBLIC COMMITMENT

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GENERAL MESSAGE

TO DEMONSTRATE THE CHEMICAL INDUSTRY
WILL RESPOND TO PUBLIC CONCERNS BY
CONTINUOUSLY IMPROVING PERFORMANCE
IN HEALTH, SAFETY, AND ENVIRONMENTAL
QUALITY.

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GENERAL PURPOSE

**IMPROVE INDUSTRY PERFORMANCE IN
HEALTH, SAFETY AND ENVIRONMENTAL
QUALITY.**

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REASONS

- CONTINUED LOW STANDING WITH THE PUBLIC.
- SARA 313 EMISSIONS AVAILABILITY.
- THIS IS A PERIOD OF REAUTHORIZATION OF MAJOR ENVIRONMENTAL LAWS.
- PUBLIC AND CUSTOMERS NEED REASSURANCE THAT THE INDUSTRY'S PROCESSES AND PRODUCTS ARE CONTROLLED RISKS.

KEY PROGRAM ELEMENTS

- ESTABLISHED GUIDING PRINCIPLES
- CODES OF MANAGEMENT PRACTICE
- PUBLIC ADVISORY PANEL
- MEMBER COMPANY SELF-EVALUATION
OF PROGRESS
- EXECUTIVE LEADERSHIP GROUPS
- RESPONSIBLE CARE IS ON
OBLIGATION OF MEMBERSHIP IN CMA

- LOGICAL EXTENSION OF CAER
ACTIVITIES
- PERFORMANCE BASED PROGRAM: NOT
A PR EFFORT
- WITH CITIZENS ADVISORY PANEL
IMPROVEMENT CAN BE MADE IN WAYS
THE PUBLIC WILL RECOGNIZE AS
PROGRESS, AND BEING RESPONSIVE
TO THEIR CONCERNS
- COMMUNICATION OF PROGRESS TO
LEGISLATORS AND PUBLIC TO
ATTAIN QUALITY REGULATIONS
- COMPLIMENT EXISTING COMPANY
PROGRAMS MEETING SAME
OBJECTIVES

VISTA COMMUNICATION PLAN

BASIC GOALS

1. CONVEY CONCEPTS, GENERAL PRINCIPLES AND SPECIFIC IMPACT OF RESPONSIBLE CARE AND ENVIRONMENTAL POLICY STATEMENT
2. DEMONSTRATE MANAGEMENT COMMITMENT

PROPOSAL

1. DEVELOP A VIDEO WITH VISTA EXECUTIVE MANAGEMENT AS "STARS"
2. CHEMNEWS ARTICLES
 - A. INTRODUCTION
 - B. PROGRESS REPORTS
3. PREPARE MATERIALS FOR "LOCAL" MEETINGS

STEPS

- 1. BRIEF EXECUTIVE MANAGEMENT -
TODAY**
- 2. INTRODUCE TO PLANT MANAGERS AND
OTHER HOUSTON MANAGEMENT -
2/16-3/16**
- 3. CHEMNEWS ARTICLE - LAST OF
MARCH**
- 4. COMPLETE VIDEO AND FIELD
MATERIALS FOR USE - MID-APRIL**

VISTA CHEMICAL COMPANY ENVIRONMENTAL POLICY

Vista Chemical Company recognizes that it's activities in producing and transporting chemical products can potentially impact the environment and communities surrounding it's operating facilities. In recognition of this, the company will conduct it's activities in such a way as to comply with all laws and regulations related to environmental quality and public health protection in all of it's activities. Accordingly, Vista is committed to manage our business according to the following principles.

1. Maintain an environmental quality assurance program to ensure that operations are in full compliance with company policies and procedures, governmental permit limitations, and regulatory requirements.
2. Reducing waste generation in all media by pursuing source control technology and to involve employees in waste minimization efforts.
3. Assess the potential for emergencies involving chemical releases which would impact the environment and surrounding communities, and strive to reduce the potential for and impact of such events.
4. Inform and educate employees, surrounding communities, customers, carriers, contractors and government agencies of

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the health and environmental hazards of the chemicals it makes, uses and sells. These activities will involve recognizing and responding to community concerns regarding environmental issues.

5. Determine how each new or existing product can be made, used, handled and disposed of safely with full attention to employee, environmental and public health protection.
6. Participate with the government and other parties in developing responsible laws, regulations and standards to protect the workplace, community, and environment.
7. Maintain an awareness of and sensitivity to environmental responsibility among Vista employees through an ongoing program of information and education.
8. Consider safety and health, environmental control and waste minimization as an essential and integral part of new process and facility design and construction.
10. Continuously strive to reduce the risk to Vista employees and neighbors posed by chemical substances used, produced, and transported within our communities.

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2/13/89