

TO: Distribution

TGG: JCL: MMG: AJO: RF
XF: DESK

FROM: T. G. Grumbles
DATE: December 9, 1988

Interoffice
Communication

SUBJ: CORPORATE ENVIRONMENTAL POLICY STATEMENT AND CMA RESPONSIBLE
CARE PROGRAM

VISTA

Since the formation of Vista, we have not had an explicit company policy statement on the corporate environmental philosophy or policy. Two years ago a draft policy was circulated to the Environmental Coordinators and consensus reached on a statement of principles that was similar to Conoco's. That document has now been redrafted to reflect new emphasis in public communication, waste minimization, product and process safety.

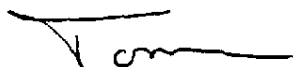
Also, CMA has instituted a Responsible Care Program requiring member companies to commit to continuous improvement in 10 program areas, which are outlined in the Responsible Care Guiding Principles (attached).

The draft Vista Environmental Policy Statement that is attached also reflects the emphasis required by the responsible care principles.

At this time, I am seeking a limited review of the Vista policy statement. Those being asked to review it are listed in the distribution. Please review the document in terms of any substantive areas we've missed, or items that are unclear as stated. I'd appreciate your comments in writing or by phone by January 10th.

Implementation of the policy will probably involve a guidelines document on the policy elements. Program development will be necessary in some areas. After management approval, it's contents will be communicated to employees.

Thank you in advance for your attention to this matter.



T. G. Grumbles

dlj
.540

Distribution: D. L. Mahler-Balt, M. G. Hayes-LCCP, V. Messik-Aber,
H. Garrison-Okc, J. McCulley, W. L. McClain, J. C.
Ledvina, M. M. Goodreau, P. Jernigan

cc: R. D. Gamblin

VVV 000006598

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 air, water, land and other natural resources. Specifically, the company shall implement programs and allocate resources to accomplish the following principles.

1. 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 compliance with company policies, governmental permit limitations, and regulatory requirements.
3. Continuously strive to minimize waste generation in all media by setting annual reduction goals, pursuing source control technology and involving appropriate employees in improving handling practices.
4. Assess the potential for emergencies involving chemical releases which would impact the environment and surrounding

communities. Maintain plans for mitigating the potential for and effectively handling events that could adversely affect employees and surrounding communities.

5. Continuously 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 adequate employee, environmental and public health protection.
7. Continuously review scientific and technical information to assure the most effective pollution control techniques and equipment are being utilized in the companies operations.
8. Maintain an awareness of and sensitivity to environmental responsibility among all Vista employees through a continuous 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.

GUIDING PRINCIPLES FOR
RESPONSIBLE CARE OF CHEMICALS

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:

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

Member Company Name

Signature

Name and Title of Signer

CMA
EC 9/12/88
BD 9/13/88

VVV 000006601