

Interoffice
Communication

TO: Tom Huffman

TGG: JCL: ERT: ~~DEF~~: AJO: RF

XF: None

FROM: T. G. Grumbles
DATE: November 5, 1990

VISTA

SUBJ: CONFIDENTIALITY OF GOVERNMENTAL SUBMITTALS

As a follow-up to my request of 10/16/90, below are general guidelines to assist in the plant efforts:

Goal

Protect to the extent allowed, information in any governmental submittal that would allow someone reviewing the publicly available files to determine capital expenditures required on projects such as capacity or quality improvements.

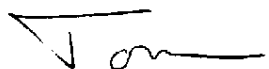
A review of current company files should be done and procedures established to protect future submittals.

Specifics

1. Determine and understand allowable state procedures for protection of required information. What can be protected and how.
2. Air submittals are probably the highest priority due to the process and equipment specifics usually required. The number of valves, specific equipment types, etc. can be used to determine specific purpose or capital required for a project.
3. Process description may have varying degrees of detail required and we should strive to provide the minimum information necessary to meet the intended purpose of the submittal.

If more detail than this is necessary in current files, we should seek to modify them, if feasible, or protect that information in some way.

Hopefully, this will help in the plant efforts.



T. G. Grumbles

dlj

VVV 000011423

TO: J. A. DeBernardi, T. H. Huffman TGG: JCL: ERT: MJH: AJO: RF

XF: J.C. KIE 10/31

FROM: T. G. Grumbles
DATE: October 16, 1990

Interoffice
Communication

SUBJ: GOVERNMENTAL ENVIRONMENTAL SUBMITTALS: CONFIDENTIALITY
PROTECTION

VISTA

During a recent effort to review the public files of a competitor in Austin, it was discovered that much of the information that we would have liked to review was in a "confidential" file. This file could only be accessed after notification and approval of the company.

This would indicate that we should take whatever steps are available to us in the future and with existing files in possession of the state or other regulators, to protect information that could give someone information indicating potential capital needed, or other impact, for environmental control expenditures.

We should ask the plants to review current state procedures for claiming confidentiality and review our existing files to remove matter determined to be sensitive.

Also, a process to assure we protect all future correspondence, applications, etc. to the extent possible should be developed.

Please let me know when the plants can complete this review.

T. G. Grumbles

T. G. Grumbles

dlj

cc: R. D. Gamblin

VVV 000011424