

Interoffice
Communication

TO: R. D. Gamblin

~~TGA: JCE: EST: MJA: AJO: RF~~

XF: Desk

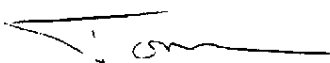
FROM: T. G. Grumbles
DATE: January 18, 1990

VISTA

SUBJ: CONTINUING EXECUTIVE MANAGEMENT AWARENESS TRAINING TOPICS

Below are suggested topics and a brief description of the intent of each for the next sessions. They are listed in our suggested order of priority. After the first several topics, the emphasis will be other than capital expenditure impact and more general in nature regarding potential impact on Vista's business.

1. Clean Water Act - Review portions of the Clean water Act and regulations that have a significant impact on Vista. This will include a discussion of OCPSF Efficient Guidelines, NPDES permits, and Biotoxicity.
2. SARA Title III - Give an explanation of the reporting requirement and compare Vista emissions 1987 vs. 1988. Discuss the use of this data to indicate priorities for future reductions.
3. Current Regulatory Action Status (lawsuits, consent decrees, etc.) - This session will include a review of recent penalty actions, proposed and payed, and a discussion of consent decrees in general and specific to Vista.
4. Product Development Regulatory Framework - The regulatory requirements, and constraints, on new chemical product development are increasing. This session will review the applicable provisions of the Toxic substances Control Act, Hazard Communication, Food and Drug Administration and other related regulatory provisions impacting R & D efforts.
5. APA Status/Groundwater Project Status - This session will include a historical review of APA retained liabilities application to environmental matters and how that "coverage" is changing. Current groundwater assessment and remediation projects are tied to the APA and the active projects will be reviewed.
6. Clean Air Act - Review current provisions of air regulations that apply to Vista such as NESHAPS and Volatile Organic compound emission rules. Discuss significant future impact on Vista of the amended Clean Air Act.


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cc: T. H. Huffman, J. A. DeBernardi, J. C. Ledvina, W. L. McClain