

THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

CALIFORNIA PROPOSITION 65

Supplier Response A

The following chemicals which are on the enclosed list may be present in materials we supply to THE ADVANCE GROUP.

Name of Material

PVC Compound

Name and Concentration of
Listed Chemical (List
numeric values, not word
descriptors such as trace
amounts)

Vinyl Chloride Monomer

Variable

Lead Compounds

Variable

Name of company/corporation responding: VISTA Chemical

Name of person completing this form: Thomas G Gaumbles

Title: Env. Quality Mgr.

Signature: Thomas G Gaumbles

Date: 3/15/88

BIOMEDICAL AND ENVIRONMENTAL AFFIARS

QUALITY IMPLEMENTATION PLAN

MARCH 16, 1988

DEPARTMENT FUNCTION

The Biomedical and Environmental Affairs department currently consists of the following positions:

- Environmental Quality Manager
- Director, Environmental Activities
- Environmental and Health Specialist
- Secretary

The Department has the following principal responsibilities and functions:

1. Regulatory Comment Preparation - Collection of data and formulation of consensus opinion on regulatory proposals in the area of OSHA health matters, EPA proposals and Department of Transportation Hazardous Materials regulations. Writing and distribution of the comments to the respective agency.
2. Trade Association Representation - Members of the department represent Vista's interests in CMA special programs (EOIC, EDC Panel), Methyl Chloride Industry Association (MCIA), Vinyl

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Institute, Soap and Detergent Association (SDA) and the Hazardous Materials Advisory Council (HMAC) and other ad hoc activities such as CLER.

3. Department of Transportation (DOT) Classification of Commercial Products - Classification and completion of COEDS DOT Hazardous Materials Classification form according to DOT regulation (49 CFR).
4. Technical Assistance to Vista Customers - By phone and written correspondence we respond to customer inquiries regarding regulatory matters impacting the transportation, handling, and use of Vista products.
5. Maintenance of Centralized Regulatory Information System - The input and distribution of regulatory information (OSHA HAZ COM, TSCA, and SARA classifications) for purchased chemicals into and from the computerized recordkeeping system is done by this department.
6. Material Safety Data Sheet Administration - The development and distribution of MSDS's for Vista products is done by this department. Computerized records of distribution are also maintained. Copies of MSDS for purchased products are maintained by the department to assist the manufacturing sites in meeting HAZ COM requirements.

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7. Program Auditing - Development of criteria, scheduling, team formation and report writing for program auditing in the areas of Environmental, Industrial Hygiene and DOT HAZ MAT administration is done by the department.
8. Product Labeling - The writing and approval of all label content for Vista commercial products is done by the department.
9. Regulatory/Technical Advice - The department gives advice on regulatory interpretations and regulatory compliance, assists in compliance problem solving, and advises on strategic planning to achieve compliance with anticipated regulations. The degree of the above activities varies with manufacturing sites. Supply and Transportation, Business Areas, and Marketing solely depend on the department for the above. Specifically, regulatory information that must be communicated to our customers is coordinated by the department.
10. Toxicology Testing of Products - The department coordinates toxicology testing of products, monitors contract laboratories, interprets and distributes testing results.
11. Regulatory Information Technical Report Dissemination - Obtaining and distribution of proposed and final regulations,

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compliance documents, technical guidelines, etc. are obtained and distributed by the department.

The above functions are owned by the department. The products resulting from these functions and processes are not clearly defined in all cases. Part of this year's efforts will be to define the department's products, develop measures, and develop process flows for at least two of our processes.

DEPARTMENT CUSTOMERS

The department is involved in functions which result in contact with numerous Vista departments as well as Vista customers. Based on current activities major customers are as follows:

1. Environmental Coordinators and Safety Directors (including R&D)
2. Manufacturing, R&D and Houston management
3. Commercial and Marketing areas
4. Supply and Transportation (Houston and Terminals)
5. Plant shipping personnel involved in DOT HAZ MAT matters
6. Houston Engineering

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7. Vista Commercial customers

8. Legal department

PROGRESS REVIEWS

The natural departmental team will meet not less than once a month. Initially, the goal will be to meet twice a month. At these meetings progress on specific departmental quality projects will be reviewed, internal departmental issues discussed, and departmental priorities established.

COMMUNICATION

Communication of departmental activities will be accomplished in two areas; external and internal. As a minimum, internal communication will be accomplished by routing of reader file communications and during natural team meetings. External communication will be accomplished by at least by-weekly reports in the progress reports and periodic project review meetings with the Legal department.

The progress reports will be aimed at general communication of departmental activities to the readers not specifically the Environmental Quality Manager's Manager.

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The project review meetings with Legal are held to communicate projects and activities of mutual interest and responsibility. Currently, the meetings are scheduled quarterly.

MEASUREMENT

A team activity this year will be to determine possible measures for our processes and activities. Measures will be explored for internal and external processes. Once identified mechanisms will be developed to record progress of effectiveness. Measures being considered to date are:

Internal - Memo typing time

Filing efficiency

Time to respond to research requests

External - Customer satisfaction on departmental products

TRAINING

All departmental personnel have attended the basic 4-day SPC course. The manager has attended team management. All other personnel are scheduled for team management as follows:

J. C. Ledvina - April 11 - 15

M. M. Goodreau - April 25 - 29

A. J. O'Connell - May 2 - 6

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QUALITY PROJECTS

To date, quality activities have included the following:

1. Organization and meetings of the natural team.
2. Surveying of Environmental Coordinators and Safety Directors to determine needs and satisfaction level. Surveys have also been used to plan annual environmental and I.H. meetings.
3. Doing process flows for internal processes including clerical activities.
4. Problem identification based on 2 and 3 above.

Current plans for additional projects in 1988 include:

1. Surveying of additional customer groups. Specifically, S&T and Commercial Areas will be surveyed by August 1.
2. Development of an improved filing system by September 15, to assure consistency of filing location and increase efficiency in file retrieval.
3. Increasing communication of departmental activities, internally and externally.

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4. Improving clerical processes, specifically filing instructions, distribution of "paper" and copying.
5. Improving quality and consistency of MSDS's for Vista products.

COST OF QUALITY

The predominant savings to be gained by the currently planned projects will be time savings as a result of efficiency and less rework. Other benefits should be seen in customer satisfaction. Other benefits may be identified as we develop measures of how we're doing.

DEFINITION OF QUALITY

Timely, Pointed, Accurate Information

Predicting and Proactively meeting management needs

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