

TO: Mike Reynolds

File-482

FROM: R. A. Conrad
DATE: February 22, 1991

Interoffice
Communication

SUBJECT: VCM Plant Community Outreach Goals & Objectives

VISTA

Attached is a copy of the subject goals and objectives for the VCM Plant that were attached to your January 28, 1991 memo. One goal that the VCM Plant agreed to do was to develop by February 28, 1991 what the Manager's Natural Team believes should be communicated to achieve the Secondary Goal Item 1.(2).

The Natural Team has determined the following should be communicated to employees:

- Responsible Care is a voluntary method to assure that the Chemical Industry can survive, that Vista Chemical Company survives, that the VCM Plant survives and that our employees jobs depend upon the success of this program. It is also a program that is good for the environment and the community. Our program will not solve all the problems at once, but will commit to make progress in all areas of concern. The program has a long way to go but we intend to be proactive in our efforts and to reach beyond the regulatory requirements whenever possible.
- Employees should be given feedback on the Responsible Care survey that was done in 1990 as well as a refresher course on what is Responsible Care. They should be advised that much of what we are doing now is Responsible Care. We should communicate more about what we are doing and what it will accomplish and do it on a continuing and frequent basis. The areas that should be communicated early on include:
 - 1) How many dollars have we spent in the last several years for this purpose?
 - 2) How many manhours were spent in 1990 by our employees for this purpose?
 - 3) Outline and discuss our EDC exposure reduction program including new FPM, double pump seals, CPS and new administrative procedures.

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- 4) That we have developed a reporting protocol that is conservative towards over reporting and we believe it is recognized by the regulatory agencies.
- 5) That we have a VOC program that goes beyond the regulatory requirement. Valve bagging frequency and laboratory emissions reduction programs are examples.
- 6) We are continuing major successful efforts in reducing EDC to the ASU. This includes upgrading steam strippers, controlling C-500 water, solving the Rupture Disk failures and improving equipment clearing methods to avoid unusual releases. List and document these efforts and the results to date.
- 7) Improvements in the C-500 stack. Replacement piping and high expenditures to seal the remaining wood pipe until it is replaced.
- 8) Continuous efforts to improve the sample systems and procedures so that employee exposure is reduced.
- 9) Expanding the Industrial Hygiene personnel exposure tracking and reporting program to cover additional chemical exposure data.
- 10) Efforts to continue to stress doing the job safely and in an environmentally acceptable way. Turnaround safety meetings with contractors and employees is an example.
- 11) Continuation of the Consent Decree program on a voluntary basis even though no longer required.
- 12) Upgrading our efforts to reduce incinerator bypasses and miscellaneous leak situations by documenting a clear cut corrective action and follow up program.
- 13) To point out Vista's participation and leadership in various community projects such as the CAER program, the air monitoring program, the Calcasieu Estuary program and the Public Advisory Panel.
- 14) Development of the leak reporting protocol procedures and subsequent training so that we do a first class job of communicating to the public.
- 15) Upgrading our inspection programs and developing new corrosion inhibiting programs that will reduce the potential for leaks.

- 16) Conservative program developed to monitor as well as to change out the H-101 Direct Chlorination Cooler.
- 17) General efforts to improve and upgrade our overall safety programs and fire water systems through the use of the Safety Action Team as well as providing additional temporary safety manpower. Examples include: New breathing air equipment has been purchased, tank dikes have been upgraded, fall protection has been emphasized and the fire water system has been upgraded.
- 18) Establish a one page weekly newsletter that includes something on Responsible Care every week.
- 19) Make employees aware of the giant scope and effort underway for the Vision project.

This outline of communications obviously would need considerable fleshing out and refinement before it can be achieved.

We await your focus groups proposal due February 28 after which these group or groups will meet to determine what employees want or need to hear in order to achieve the objectives of this program.



R. A. Conrad

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cc: THH TGG MAS JCG (HOUSTON)
PDC - Mgr. Natural Team Members
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