

TGG: JCL: MMG: (RF)
XF: Blane

Thomas G. Grumbles

VISTA

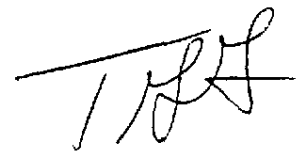
To Dave Campanella

Date 7/6

It's not clear to me if you're
already using the big label.

If not the small one (per
Premiere citation) is what's
required to be on the label.

We also have to notify in writing,
by letter etc., of the hazards of
lead. We could send a cover letter
with an MSDS.



VVV 000014513



Anzon Inc.

2545 Aramingo Avenue, Philadelphia, PA 19125
(215) 427-3000

LEAD
LEAD
LEAD

24.9 - 284

CO-138

LEAD

Lead poison hazard. For industrial use only. Inhalation and/or ingestion of lead may result in severe damage to your blood forming, nervous, gastrointestinal, urinary (kidney) and reproductive system. Keep away from feed and food products. Keep out of reach of children. Do not reuse container for other purposes. Keep away from heat and open flame. Keep containers closed. Please see safety data sheet (MSDS form) for additional health effect information.

VVV 000014514

CAUTION

CLOTHING CONTAMINATED WITH LEAD.
DO NOT REMOVE DUST BY BLOWING OR
SHAKING. DISPOSE OF LEAD CONTAMINATED
WASH WATER IN ACCORDANCE WITH APPLICABLE
LOCAL, STATE, OR FEDERAL REGULATIONS.

Tom,
✓ This is from
the BHA citate
© Premiere

WARNING

I made this
paraphrasing
from ARZON
warning label

THESE UNIFORMS HAVE BEEN EXPOSED TO AND MAY
BE CONTAMINATED WITH LEAD COMPOUNDS. INHALATION
AND/OR INGESTION OF LEAD MAY RESULT IN SEVERE
DAMAGE TO YOUR BLOOD FORMING, NERVOUS, GASTRO-
INTESTINAL, URINARY (KIDNEY) AND REPRODUCTIVE
SYSTEMS. AVOID CREATING DUST. KEEP AWAY FROM
FEED AND FOOD PRODUCTS. WASH HANDS AFTER HANDLING
AND BEFORE EATING, SMOKING, OR DRINKING.
PLEASE SEE SAFETY DATA SHEET (MSDS) FOR
ADDITIONAL HEALTH INFORMATION.

VVV 000014515

I could not find any stated working
in Lead appendix A-C. ~~the~~ Belame
both contain info that must be given
to laundry services per Lead STD and
HAZ-Com.

David C 6/27/88

TO: Distribution

~~TO:~~ JCL: ~~MMG:~~ RE
XF: none

FROM: T. G. Grumbles

DATE: July 6, 1988

Interoffice
Communication

SUBJ: MANPOWER NEEDS ASSESSMENT TEAM MEETINGS

VISTA

The subject meeting will be held on Tuesday, July 12, 1988 from 10:00-3:00 p.m., at the LCLAB plant conference room. I have attached the following:

1. Results of the brainstorming session in Galveston addressing the question, "What are we not doing due to insufficient manpower".
2. Two pages handed out at the management meeting on June 13. This meeting was attended by Inbody, Ferrell, Gamblin, Debernardi and myself. It was at this meeting that it was decided to appoint team members.

A draft agenda for the meeting is below.

- | | |
|--|-------------|
| 1. Review of the manpower issue | TGG 15 min |
| 2. Develop and agree on mission statement | ALL 20 min |
| 3. Discuss time-frame for project | ALL 10 min |
| 4. Discuss relationship of this team to careers team | TGG 10 min |
| 5. How to define the problem | ALL 45 min |
| 6. Problem solving | ALL 180 min |
| 7. Summarize and agree on action items | ALL 15 min |

The following are some thoughts to consider for the meeting. These are based on multiple discussions with Houston manufacturing management and plant environmental personnel.

1. This effort will be more of a "strategic planning effort" than a "short-term" assessment of what we need right now. Acute needs can be addressed and communicated for this budget cycle but it's possible the teams efforts will not be complete by then.
2. The number of things we're not doing should be categorized or reviewed in terms of the

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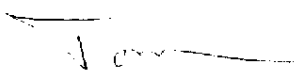
consequences of not doing them. Compliance is clear, but the other issues, waste minimization, training, etc. need definition.

3. We should consider the following questions:
 - a. Can the existing organization meet the needs?
 - b. What impairs progress now?
 - c. Who should be doing the things we're not doing? Who owns them?
 - d. Are the needs routine, project oriented, intermittent?
 - e. What type of person can do the tasks?
 - f. How do we measure/monitor how we're doing now?
4. The assessment will include Manufacturing, R & D, Houston staff, and Engineering (Houston and Plants).

Below is a first attempt at a mission statement.

The environmental manpower team will assess the manpower needs of the corporation in the areas of compliance, environmental control programs and related areas and make recommendations to the appropriate management level regarding the type and number of people needed to meet those needs.

As noted on the agenda we will refine and agree on the mission statement at the meeting.


T. G. Grumbles

dlj

Distribution: Paul Warner, Mike Hayes, Doug Michels

cc: Barb Swan

Attachments

VVV 000014517

PERMITTING (All CAA, CWA, TSCA, etc.)

Insufficient:

Prioritization, strategy, time allocation, and quality of permit applications.

COMPLIANCE

Insufficient checks and balances to detect and prevent non-compliances

TRAINING

Not developing and implementing a comprehensive training program for personnel at all levels.

WASTE MINIMIZATION

Not developing and implementing a comprehensive (all wastes) waste minimization programs involving all levels of personnel and clear goals.

BIG PICTURE/PLANNING

Insufficient planning of big picture items/strategic planning

- prioritizing
- coordinating
- information sharing
- feedback
- not proactive/preventative orientation
- personnel planning

MISCELLANEOUS

Lobbying government, citizens and industry

Disaster planning/mitigation

VVV 000014518

- Research
- communication

01. Not moving fast enough to comply with wastewater regs.
02. Training time.
03. Trucking existing programs.
04. Prevention plans for releases.
05. Permitting efforts done too late/hurried.
06. Auditing programs.
07. New environmental professional development.
08. Updating manuals in a timely fashion.
09. Waste stream selling.
10. Paperwork/regs reading, etc.
11. Not complying with regulations maybe.
12. Not training people on basic chemistry.
13. Not keeping up with environmental \$ projections
14. Not enough time to understand impact of projects re: other regs.
15. No big picture planning
16. Not training operations personnel enough
17. Not training line management.
18. Role confusion between plants and corp. re: policy setting.
19. Not sufficient data base on products and intermediates.
20. Short-term _____ evaluation vs. long-term.
21. No R&D on Env. Solutions
22. No formal environmental training program
23. No board of director awareness
24. Not advertising good things we do
25. Not enough community/PR
26. Not looking at ways to recycle waste
27. Not setting priorities on environmental programs

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28. Not involving Legal early-on re: compliance issues.
29. Not enough legal people for environmental and OSHA
30. Not looking at groundwater contamination prevention.
31. Not suing government enough.
32. Not making Conoco pay enough
33. Not collecting data to be used in agency comments.
34. Not doing this often enough.
35. Too many unproductive/time-consuming meetings.
36. Uneven quality in permit applications.
36. Not doing PSD permitting activity.
38. Not considering turnarounds in reg compliance schedule.
39. Still quick fix oriented.
40. Not streamlining existing environmental reporting/recordkeeping.
41. Not modeling Bhopal scenarios.
42. Not coordinating CAER & SARA.
43. Not progressing on bio-monitoring.
44. Not being consistent in reporting protocols.
45. Grunt work done by technical staff.
46. Emission reduction efforts (non-regulatory).
47. Not seeking new environmental technologies.
48. Zero effluent goal.
49. No long-term waste minimization goal.
50. Confusion between corp. & plant env. policy setting & interpretation.
51. Confusion of environmental and engineering roles.
52. Waste association membership.
53. Boggling air emission for msm't.
54. Too much time training people in environmental regulations.

55. Not involving people in trenches in solutions/problem solving.
56. Project leaders to consolidate all affected/involved groups.
57. Environmental seminar participation (Technical)
58. Implementation procrastination.
59. Chain of custody.
60. Updating cost study.
61. Testing tightness of underground facilities.
62. Analyzing groundwater protection measures/spill control.
63. Not influencing new regulations.
64. Not birdogging new chemical process developments.
65. What are we doing to cross-fertilize?
66. Detailed follow-up to tie-up loose ends after a report.
67. Not moving clerical functions off our desk.
68. Not coordinating company wide efforts on wastewater.
69. No one person to handle DOT regs.
70. Waste minimization action missing.
71. Not reviewing and upgrading existing programs
72. Not eliminating manuals.
73. Not enough input on important matters to those outside that matter
(Lobbying)
74. Take environmental Risks.
75. Obtaining quality/correct data.
76. Prioritizing issues/projects.
77. No new plant project permitting activity.
78. Making available training resources.
79. Not being vague enough in permit applications.
80. Not considering terminals in activities.

81. Env. coordinators at each plant.
82. Profile of env. programs not high as other ones (i.e., energy)
83. Not obeying 312/311 requirements.
84. Not making sure "no leak" certifications are right.
85. TSCA policies/safeguards compliance.
86. Not learning from past mistakes.
87. Not industry leader in environmental efforts.

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WORKLOAD WORKSHOP

- The intent is to develop a list of important environmental work not getting done or getting done minimally anywhere in the company.
- We will discuss whether Vista has enough people, in the right places, working on the right things. All functions doing environmental work can be addressed including Plants, Engineering, Legal, Houston Environmental.
- The Objective is to first develop a list of work not getting done, decide how important the work is, then select a final list of important work not getting done for presentation to the attendees at the Environmental Meeting.
- In the Environmental Meeting, we will decide what should happen next (in anything).

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Management
Discussions



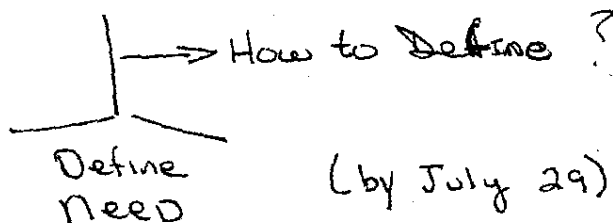
Environmental Meeting
Workshop and Plant Mgmt. Review



Houston Mgmt Meeting (June 13)



Form Manpower Team (by June 20)



Plant Eng. Env. Professionals Houston Engineering



Determine Resources
needed (Type of people)



Recommend Type & Number

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Need From You

1. Commitment & Support to Team
2. Thoughts on How to Assess Needs

Questions to Ask | Needs Definition

What's not getting Done

Consequences / Risk of Not Doing it

Categories of Activities — Compliance

High Need — Stay Ahead
of Regs (Legi.)

Highly Desirable — Coop, Polic.
Env. Direct.

Desirable — i.e. Public Pressure
Public Relato.