

TO: Distribution

TGG: JCL: FGJ: AC: AJO: RF

XF: DesL

FROM: T. G. Grumbles

DATE: June 13, 1991

VISTA

Interoffice
Communication

SUBJ: SAFETY AND HEALTH AUDIT MODULES

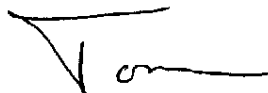
Attached are the reworked modules for your review. Please give a detailed review to "your" modules, but also review others for obvious problems. Specifically, I had some questions when I assigned verification codes and final points to the modules, so let me know if you see problems or need changes there.

Brent has sent you his system introduction part under separate cover. Please review that draft and provide comments back to him directly.

I think we need to have a brief description of what the module covers on the cover page for each module. This would be in addition to the title, and the regulatory or other basis for the module. A sample cover page is attached. Please provide the text for these summaries to me (no disc required) directly.

The more I reviewed the individual modules, it seemed that a separate medical surveillance module, versus portions in the substance specific standards, would not work. The substance specific standards all have portions that are different and very specific. At this time, I'm proposing we don't do one. Let me know what you think. I am proposing a conference call to discuss the modules, the introduction portions, and what we do next. At that time we can decide if we need to meet. I'll propose an agenda when we get a call set.

PLEASE LET ME KNOW YOUR AVAILABILITY ON THE 20TH OR 21ST FOR THE CONFERENCE CALL.



T. G. Grumbles

dlj
.239

VVV 000006382

Attachment

Distribution: Mike Lunsford-Oke, Brent White-Balt, K. L. Fogg-LCCP

Note: The format for most of the enclosed modules is similar to what we think they should look like. Before finalizing the modules will be ordered and a notation put on each page to identify it. Comments on format are requested.

THH

TGG: JDL: ~~EGJ~~: AC: AJO: RF
XF: None

Thomas G. Grumbles

VISTA

To Tom Hoffman
Eric Meyer

Date 6/6

Attached is a brief
summary of the status
of the La. Process
Safety Regs

VVV 000006383

Environmental Committee Report for the
LCA Board of Directors Meeting
May 24, 1991

I. Air Toxics

LCA is finalizing comments on the proposed Louisiana Air Toxics Regulations for the DEQ public hearing on May 28, 1991 (1:30 p.m. - DNR Mineral Board Room, Baton Rouge, La.). Written comments must be submitted to DEQ by May 31, 1991. Several problems still exist with the proposed air toxics rules that LCA will comment upon in order to seek further changes.

The Mid-Continent Oil & Gas Association held several meetings on May 9, 17 and 22, 1991 with other industry groups (including LCA) concerning proposed legislation affecting the state's air toxics program. Mid-Continent has filed several legislative bills that exempt or suspend part or all of the state air toxics program. Mid-Continent plans to schedule some of their bills soon and will be seeking support from other industry groups for their proposed legislation. At our meeting on May 7th the LCA Environmental Committee voiced concern over supporting legislation that completely exempts a part of the regulated community or that suspends the entire air toxics program. LCA has previously supported efforts to encourage DEQ to adopt rules consistent with corresponding federal standards (i.e. the new Clean Air Act). We have also previously objected to portions of the proposed rules that clearly go beyond the existing state air toxics law. Mid-Continent is also considering drafting or amending legislation to suspend only specific portions of the proposed air toxics rules rather than suspending the entire program. If properly drafted, such legislation could alleviate some of our major concerns or at least force DEQ to consider making further changes to the proposed rules prior to final adoption. The LCA Board is requested to provide guidance as to LCA's position on the proposed legislation, air toxics regulations and public comments.

II. Accident Prevention

LCA has formed an Ad-Hoc Committee under the LCA Responsible Care Committee to review and develop comments on proposed DEQ "Accident Prevention" rules. The DEQ Citizens Advisory Committee met on April 29, 1991 and agreed to extensively revise an earlier draft of the proposed "Accident Prevention" rules. Another meeting of the DEQ Citizens Advisory Committee has been scheduled for Thursday, May 30, 1991 (9 a.m. - DEQ 6th Floor Conference Room) to further discuss the proposed rules. The revised draft was suggested by several industry representatives and it more closely follows existing OSHA and "Responsible Care" requirements.