Inter-Office Correspondence

File

Date March 21, 1984

To: Distribution*

From W. B. Graybill

Location 36 West

Subject 1984 Accountability Management Document

Attached is a copy of my 1984 MBO Document for your use. Since a large part of these goals involve teamwork with each of you, I am soliciting your inputs, comments, and cooperation towards their achievement.

W B Graybill

W. B. Graybill

/yra

Attachment

*Distribution

T. G. Brown/W. E. Dean
C. P. Blahous
J. C. Delgado
A. P. Leber
R. K. Lee
C. R. Reiche/R. T. Rogers
R. J. Samelson
G. C. Strickler/W. J. Peard/F. C. Ludden
D. E. Van Cleef

Form 503-A Rev 3 83

SL 102677

PPG INDUSTRIES

ACCOUNTABILITY MANAGEMENT

1984 GOALS

Group: Chemicals
Incumbent: W. B. Graybill
Title: Director, Environmental Affairs

Reports to: I. C. Klimas
Title: Director of Operations - Chemicals
Functional Report: J. L. MacMillan, Vice President - APC
R. D. Duncan, Vice President - IC

Accountability I

Occupational Health and Toxicology - Safety,

Provide for a safe working place and safety awareness for the department employees to keep Chemicals at the top of the safety performance list for similar industries. Protect the health of employees by directing the creation and implementation of well designed occupational health, industrial hygiene, and toxicology programs.

Measures	Goals	Comments
1) Safety - Plant Visits	1) Be aware of and practice all safety rules appropriate for plant visits. Have no AWC.	
2) Safety - E/A Department	2) Promote safety awareness on and off job. Quarterly safety meetings for department - J. C. Delgado, Chairman.	
3) Compliance With New OSHA Hazards Ruling	3) Direct the activities involved in timely dissemination of toxicity and hazards information to Chemical Group employees to comply with deadlines.	
4) Operation of RHCC Committee	4) Continue emphasis in RHRC policy formation activities to develop current information. Delegate J. C. Delgado and A. P. Leber - toxicologist.	

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Accountability I continued

5) TSCA 8(e)	5) Develop responses to regulatory authorities on a timely basis (TSCA 8(c) and 8(e)) and comments on regulations. Chair the TSCA 8(e) Review Committee.
6) E/A GP&Ps	6) Keep GP&Ps current and meaningful through delegation to Delgado, Lee, and Samelson.
7) Lime Lakes Health Study	7) Keep focus on Barberton Lime Lake residents' health study results. a. Contact OEPA or Mr. Indian bi-monthly--J. C. Delgado.
8) Engineering Standards Involving Industrial Hygiene	8) Insist that engineering design standards take into account health hazards and industrial hygiene awareness and that ACTs address these issues appropriately. a. Meet with Central Engineering to review. b. Review all ACTs.
9) Industrial Hygiene Audits	9) Give overall guidance to the industrial hygiene audit procedures and programs at plants. a. Improve response and "fix-it" time.
10) IPELs	10) Insist on J. C. Delgado and A. P. Leber keeping IPELs current. a. Review twice per year.

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Accountability I continued

11) Sun Health Modules

11) Encourage modernization (computer programs, etc.) of health and hygiene programs.

a. Have Sun Health medical module evaluated.

b. Expand use of Sun audiometrics module as necessary.

12) Awareness - Industrial Hygiene

12-a) Plan for combined health/safety conference - (See VII 2, pg. 15).

12-b) Increase level of awareness by meetings with R. D. Duncan, J. L. MacMillan, and Plant Managers.

(1) Issue accountability document statement to plant managers via A. G. DeMarco.

13) Toxicology

13-a) Oversee and direct the toxicology program to enhance its effectiveness and usefulness.

(1) Attend CIIT annual review.

(2) Keep Business Units appraised of developments as they occur.

13-b) Further integrate with BTC contract toxicology programs.

(1) Have Dr. Leber attend BTC MBOs.

(2) Consider cross-fertilization.

13-c) Give priority to existing or new products and intermediates that have widest exposure potential--tests.

Accountability II

Environmental Programs

Minimize the adverse effect of Group activities on the environment by initiating and executing studies and implementing and directing control programs to assure that we achieve or exceed Corporate and regulatory compliance with environmental standards in a prudent manner.

Measures	Goals	Comments
1) NPDES Compliance	1-a) Review routinely and help solve NPDES non-compliance situations and re-negotiations at plants.	
	(1) Lake Charles, Barberton, and Natrium emphasis.	
	1-b) Review Lake Charles south plant situation.	
2) Communications	2) Improve on effectiveness of communicatons between G.O. and plants.	
	a. Environmental workshop - Lake Charles - October, 1984.	
	b. Weekly telephone contacts.	
	3) Notify legal and accounting of any change in environmental related lawsuits or threats of suits due to incidents.	
	a. Issue quarterly SEC update questionnaire for all plants.	
4) Procedures/Protocols	4-a) Direct preparation of Environmental Procedures/Protocols (existing and new).	

Accountability II continued

4-b) Review at plants with R. J. Samelson.

4-c) Complete balance in 1984.

5) Audits

5-a) Follow-up to properly close all 1983 audits with emphasis on Beauharnois.

(1) Review with plants, legal, Corporate E/A.

5-b) Follow 1984 audits of Beaumont, Kalium, Lake Charles Plant A, Natrium, and Michigan Oil/Gas.

(1) Confer with Corporate E/A and plants.

(2) Attend at least one plant session.

(3) Direct timely response and closing of audits via R. J. Samelson.

6) Environmental Programs

6) Seek ways to modernize the environmental program area; computerization, etc. for better productivity.

a. Use solid waste outside site review company to comment on all of our sites as needed.

b. Evaluate Suneco--three modules at Lake Charles.

7) Assure solid waste is disposed of properly.

Accountability II continued

Environmental Programs cont'd

a. R. J. Samelson/J. W. Osheka to inspect biannually.

b. Use contracted site inspection firm. (See 6a, page 5)

8) Try to improve relations with all agencies.

a. Personal contact at EPA offices.

9) Closures, Decommissioning

9-a) Complete RCRA closure of Caribe (close by July 1).

9-b) Complete Corpus closure in 1984.

9-c) Resolve directive letter on Jersey City chrome lots issue.

9-d) Provide oversight to Beaumont and Barberton decommissioning and decontamination.

10) Underground Water

10) Further develop understanding and mitigation plans for underground water situations at all plants and Jersey City. Follow Beaumont and Barberton decommission with groundwater studies as needed.

11) Review and sign-off on all ACTs.

12) Re-direct emphasis towards reduced use of landfilling and more on-site incineration.

a. Lake Charles incinerator project reactivated towards ACT-1984.

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Accountability II continued

13) Lime Lakes Reclamation

13-a) Continue giving oversight direction for lime lake reclamation program - Barberton. R. J. Samelson to direct.

13-b) Quarterly review with Barberton Engineering, Snell, R. J. Samelson, and Management.

13-c) Get Pilot Plant ACT approved by April 1--$870M.

14) ENSCO - El Dorado, Ark (Lake Charles Chloro-hydrocarbon Destruction)

14-a) Complete close-out of ENSCO issue per contract, August, 1984.

14-b) Have site inspected at least twice in 1984.

15) OEPA Consent Order -Barberton

15) Resolve Barberton particulates consent decree issue - past non-compliance fines.

a. Further discussions with OEPA along with J. MacNealy, Legal, etc.

b. Resolve boiler shutdown dates by April 1.

16) Trade Associations

16-a) Support activities and evaluate effectiveness of CIBO and its goals. Represent Chem Group on CIBO.

Accountability II continued

16-b) Evaluate SOCMA for our continued support.

(1) Be PPG's representative.

(2) Attend appropriate meetings.

(3) Communicate with New York Sales Office.

(4) Review dues history.

16-c) Evaluate PCIC associate membership during 1984.

(1) Attend annual meeting.

17) Coordinate outside interest in Morton mine and bring to attention of management.

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Accountability III

Product Safety

Implement and direct the Corporate and Group Product Safety Policies by developing and directing an organization and program to accomplish the objectives of the policy and all regulatory requirements.

Measures	Goals	Comments
1) Product Safety	1) Policy revision oversight to R. K. Lee for updating Chemical Product Safety Policy by second quarter 1984. a. Assure implementation of this with Field Sales inputs. 2) Improve on early involvement of product safety function with Business Unit plans for new products, i.e., Ag. Chemicals and SPU emphasis. a. Conduct discussions with T. Zinninger, J. P. Luvisi, etc. 3) Lend all necessary assistance to successful introduction of PAC. b. Stress use of A. J. Tolmsoff by G. J. Lazarchik. 4) Make comments as necessary to legislative/regulatory bodies in product safety area that assure good legislation. a. Work through Gary Wilson, P. M. King.	

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Accountability IV

Legislation - Regulations

Ensure that Corporate, government, and industry environmental and industrial health standards are met and that the Company's image is enhanced as an environmentally responsible Corporate citizen through the application of the best available expertise, by maintaining a high level of knowledge of the state-of-the-art, and coordinating the input and efforts of the various Group and Corporate functions involved. Improve the working relationship and overall effectiveness of programs involving the joint responsibilities of Environmental Affairs and Employee Relations.

Measures	Goals	Comments
1) Legislation - BAT, Superfund, Etc.	1) Provide oversight and direction to inputs to good environmental legislation:	
	a. Water - HSIA; WPCF; NEDA; Clean Water Act, review of proposed changes.	
	b. Air Programs - SOCMA, APCA, HCSA, Clean Air Act, review of proposed changes. (Gary Wilson, P. M. King, R. J. Samelson)	
	c. Solid Waste - Chlorine Institute. (R. J. Samelson)	
	d. Toxicological - CIIT, HCSA. (A. P. Leber, Z. G. Bell)	
	2) Comment as necessary on all substantive regulations proposed by EPA affecting chemicals.	
	a. Work closely with Gary Wilson and C. P. Blahous.	

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Accountability IV continued

b. Organics BAT proposals - monitor timing for ACTs.

c. 308 questionnaires to plants. Completion on time.

d. Follow new solid waste rules.

e. Follow Superfund rules-- follow re-issuance.

f. Follow new asbestos rules as it affects chlor-alkali.

3) Zero Discharge

3) Participate, guide, and review the Lake Charles Zero Discharge RES progress--R. J. Samelson to take lead role to attend Lake Charles review meetings.

a. Attend at least one plant review meeting.

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Accountability V

Communications; Permits

Develop a good communicating and working relationship with the staff of the Corporate Environment, Health and Safety Department to assure close support and agreement of Group and Corporate policies in matters of environment, health, and safety. Develop communicating relationships with appropriate federal and state regulatory and legislative staff groups, provide constructive comment on their environmental activities, and coordinate the receipt of necessary permits and variances. Ensure the clean and sufficient communication with the Business Units, Legal, Engineering, Manufacturing, and Research & Development and Sales Distribution departments to secure their understanding of Corporate, Group, and regulatory compliance needs.

Measures	Goals	Comments
1) Permits	1) Continue to work with Central Engineering and Business Units to help ensure timely involvement in permitting requirements.	
	2) Direct permitting of U.S. Potash test facility and commercial plant on timely basis. a. Oversee Stearns-Rogers, Fenix-Scisson - R. J. Samelson. b. Meet with Michigan DNR as required.	
	3) Same for new Lake Charles power unit and PAC. a. Work with J. Antil, R. J. Samelson to submit application first quarter of 1984. b. Obtain PAC PTI, PTO by 4/1/84.	

Accountability V continued

4) Coordinate the environmental permitting effort with plants, Law, and Business Units by involving appropriate contractors (complex situations) and effluent inventories.

5) Communications - Corporate

5) Participate in Technical and Production Subcommittee meetings and programs and Corporate Envionment, Health, and Safety meetings to enhance communications with C. P. Blahous' function.

6) Continue to input into Corporate policy formulation in light of Chemical Group policies and practices. Work closely with Corporate Environment, Health, and Safety.

7) Issue copy of 1984 E/A Goals document to C. P. Blahous.

8) Communications - Group

8-a) Attend each APC/IC staff meeting to report on E/A issues.

8-b) Insist and facilitate good communication between departments and Mfg., Bus. Units, Law, R/D, Central Engr., etc. to maximize effectiveness of E/A.

Accountability VI

Subordinate - Managers Performance--Productivity

Maximize the performance and productivity of the managers addressing environmental, health, and product safety programs throughout the Department. Provide effective functional guidance and oversight to the activities of all principal environmental and industrial hygiene positions at manufacturing plants and terminals.

Measures	Goals	Comments
1) Subordinate Development	1) Encourage sharpening of skills by each manager by in-house or outside training sessions - develop IDPs. a. Assign IDP action steps to proper MBO. 2) Issue copies of my goal document to E/A staff. 3) Improve on E/A internal communications. a. Optimize new building office effectiveness. b. Hold two staff meetings per month.	
4) Plant Environmental Contacts	4) Cultivate good working relationship and functional direction with each plant location environmental staff and industrial health/hygiene staff. a. Weekly telephone contacts.	

Accountability VII

Image

Enhance and project the company image as an environmentally aware, technically sound and responsible Corporate citizen.

Measures	Goals	Comments
1) Employee Relations Interface	1) Establish and maintain good coordination and interaction with Employee Relations' safety and health area. Providing oversight for: a. Reproductive Hazards Policy Development (RHCC) - J. C. Delgado. b. Health Hazards Assessment - J. C. Delgado. c. Employee Overexposure Notification--Implementation - J. C. Delgado. d. Health Area Practice Audits - J. C. Delgado. e. Noise - J. C. Delgado.	
	2) Work closely with Don Van Cleef on planning June, 1984 combined Health Safety Conference - Pittsburgh (See I 12a., p. 3).	
3) Image - Media	3) Provide direction to response to media and citzens' inquiry on environmental issues; work closely with Public Relations.	

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Accountability VII continued

Image - Media cont'd

a. U.S. Potash permitting.

b. Barberton mercaptan.

c. Lake Charles VCM SRV lawsuit.

d. Lake Charles underground water issues.

4) Anticipate the level of awareness needed by the public and provide direction towards development of Public Relations plans.

5) Image - Agencies

5-a) Provide oversight to all responses to agency directives and citations by involving legal and the plants.

5-b) Improve relationships with all agencies wherever possible by direct involvement in meetings.

Accountability VIII

Personal Growth and Development

Continue personal growth and development for managerial effectiveness in all accountability areas through involvement in appropriate on-job and off-job activities and development opportunities.

Measures	Goals	Comments
1) Trade Associations	1) Maintain active representation, participation and evaluation in appropriate associations and committee activities: CIIT, CMA, SOCMA, CI, CIBO, HSIA, HCSA, AIHC, PCIC, etc.	
2) Skills Improvement	2) Attend appropriate management skills development course in 1984. a. Review with T. C. Harter by March 15, 1984.	
	3) Read "Inside EPA", Wall Street Journal, Chemical Week, Chemecology, CMA News, Business Week, Chemical Marketing Reporter, and Pesticide News, as often as possible.	
	4) Attend Environmental Regulation Update course, Washington, DC, May, 1984.	

Accountability IX

Compliance-Equal Employment Opportunity Policy

Support and comply with PPG Industries' Equal Employment Opportunity Policy program and implementation.

Measures	Goals	Comments
1) EEO	1) Require each manager's awareness and compliance of the EEO policy.	
	2) Comply with EEO policy and contribute to accomplishment of Group's goals.	
	3) No citations.	

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PPG INDUSTRIES, INC.

ACCOUNTABILITY MANAGEMENT

~~1984~~ GOALS

Group: Chemicals
Incumbent: R. J. Samelson
Title: Manager, Environmental Programs

Reports to: W. B. Graybill
Title: Director, Environmental Affairs

Accountability I

Promote safety on and off the job, including safe driving, recognition of unsafe conditions and adherence to plant safety rules.

Measures	Goals	Comments
1. Time lost as a result of job connected accidents.	1. No lost time due to accidents.	
2. Safety as a topic of review with staff.	2. At least monthly meetings to emphasize some aspect of safety.	

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Accountability II

Assure maximum attention to the solution of problems by maintaining open communications, both internal and external.

Measures	Goals	Comments
1. Proper persons informed of developing problems and situations.	1a. No requests for additional copies of memo's from those needing to know.	
	1b. Staff meetings held on a monthly basis with subordinates.	
	1c. Environmental workshop held at Barberton in late October.	
2. Management kept informed of progress.	2a. Comprehensive monthly reports issued in a timely fashion.	
	2b. Update reports prepared as required.	
	2c. BAR prepared for management review in fall.	
	2d. All significant noncompliance situations brought to management attention.	
3. Changes to regulations brought to the attention of plants and management.	3a. Rules of significance summarized for plants and management as issued.	
	3b. Hold monthly meetings with Corporate Environmental Affairs to review status of regulation and legislative issues.	

Accountability II (continued)

Measures		Goals	Comments
4. Procedures and protocols prepared for internal plant use.	4a.	Complete the revision of existing procedures by July 1.	
	4b.	Complete the writing of new procedures as required by each plant by Dec. 31.	
5. Obtain agreement on environmental priorities.	5a.	Participate in environmental priorities review at Lake Charles.	
	5b.	Participate in Beauharnois environmental reviews and give guidance to programs on at least a quarterly basis.	
6. Participate in external seminars.	6a.	Participate in DNR/LSU hazardous waste seminar if approved by Law Department.	

Accountability III

Assure that operations are able to and do comply with federal, state and local laws and company policies.

Measures	Goals	Comments
1. Number of noncompliance incidents reported to agencies.	1a. Insist on plant performance so that noncompliance with water permits is maintained at 99% on a daily basis and 95% on a monthly basis.	
	1b. No unreported noncompliance incidents of air pollution control equipment.	
	1c. No unresolved hazardous waste management incidents.	
	1d. No PCB noncompliance incidents.	
2. Compliance tracking systems installed and operating.	2a. SUNECO system at Lake Charles with four operational modules - Permits, NPDES, Events, EIQ.	
	2b. Evaluate SUNECO performance by end of third quarter.	
	2c. SUNECO system installed at Natrium with three modules by year end.	
3. Responsible NPDES permits issued for interim BAT/BCT discharges.	3a. Give guidance to the negotiation of Natrium permit.	
	3b. Give guidance to the negotiation of the Lake Charles permit.	
	3c. Give guidance to the negotiation of the Barberton permit.	

Accountability III (continued)

Measures	Goals	Comments
4. Responsible new facility permits.	4a. Give guidance and direction to Michigan potash test facility permits.	
	4b. Give guidance and direction to commercial potash facility permitting including EIS preparation.	
	4c. Participate in permitting of new power facilities at Lake Charles.	
5. Responsible 'Part B' permits issued for hazardous waste T-S-D.	5a. Participate in reviewing Lake Charles part B application.	
	5b. Complete resolution of hazardous waste permit issues at Beaumont.	
6. Responsible closure plans adopted for discontinued RCRA facilities.	6a. Give guidance and direction to completion and closure plan negotiation at Puerto Rico by July 1.	
	6b. Review and guide closure plan for south plant at Lake Charles	
7. RCRA noncompliance identified and corrected.	7a. Assessment/mitigation programs developed for Lake Charles, Natrium, and Beaumont (groundwater).	

Accountability III (continued)

Measures	Goals	Comments
8. Follow-up on audits.	8a. Follow close out and response to 1984 Corporate audits.	
	8b. Provide oversight to plants to complete closure of open items as of December 31, 1983.	
9. PCB Compliance	9a. Give guidance to the development of PCB exemption data.	

Accountability IV

Assure that nonregulated environmental practices meet company policy requirements.

Measures	Goals	Comments
1. Hazardous waste disposal with outside contractors continues to emphasize "least risk".	1a. Continue inspections and biannual listing of approved sites. Annual PPG inspections for most used facilities, supplement with contracted inspection reports.	
	1b. All listed and approved sites inspected by PPG personnel at least every two years, supplement with contracted inspection reports.	
2. Jersey City cleanup satisfactorily negotiated and completed.	2a. Optimum cost/benefit cleanup situation defined.	
	2b. Agreement reached with New Jersey officials and property owners on cleanup scope.	
	2c. Cleanup contracts awarded and implemented.	
3. Puerto Rico cleanup completed.	3a. Continue oversight on cleanup activities at Puerto Rico, giving signoff to final non-RCRA closure by July 1.	
4. Corpus Christi cleanup completed.	4a. Continue oversight on cleanup activities at Corpus Christi, giving signoff to final closure by December 31.	

Accountability IV (continued)

Measures	Goals	Comments
5. Limelake reclamation meets environmental objectives.	5a. Provide oversight and participate in the design of pilot studies and commercial facility and in public relations aspects. Commercial design must be odor free.	
	5b. Motivate marketing aspects of reclamation.	
	5c. Assure that quarterly reviews are held with management.	
6. Groundwater programs continued to provide basis for management response.	6a. Further refine groundwater investigations in limelakes area with emphasis on wells #31 and #32 and the NW quadrant of the study area. Cooperate with OEPA as required.	
	6b. Define phase III work and implement at Beaumont.	
	6c. Observe response of withdrawal well at Natrium and define forward program.	
	6d. Review and give guidance to main plant investigation at Lake Charles. Provide emphasis to keep this program moving.	

Accountability IV (continued)

Measures	Goals	Comments
	6e. Follow progress of perchlor cleanup at Lake Charles. Participate in final signoff.	
	6f. Review and give guidance to groundwater investigation and mitigation programs at Beauharnois.	
7. Fugitive mercury emissions controlled at Lake Charles.	7a. Phase I mercury game plan taken forward to ACT.	
	7b. Aquatic life chemical analysis program continued.	
8. Mitigaton of unusual incidents.	8a. Participate in defining azide disposal.	
	8b. Guide PPG response to external clean-up problems as required.	
9. Technical input to PAC program.	9a. Provide technical input to PAC to enable a proper marketing and field test effort to be implemented.	
10. Establish a beneficial use for the Norton mine.	10a. Provide oversight and participate in examination of potential uses for the mine.	
11. Identify alternate pollution control technology.	11a. Provide guidance to the Lake Charles zero discharge project.	
	11b. Provide emphasis to the completion of incineration studies at Lake Charles.	

Accountability V

Provide technical assistance to the Law Department in support of litigation and regulatory activities.

Measures	Goals	Comments
1. Provide assistance as needed on environmental issues.	1a. Follow-up inspection to sign-off on hazardous waste disposal at ENSCO by August 1.	
	1b. Participate in new litigation as necessary (e.g., BAT regulations).	
	1c. Participate in final settlement of Barberton SO_2 and particulates issues.	
	1d. Provide input regarding technical issues associated with non-owned hazardous waste sites.	
	1e. Assist in resolving Perchlor spill issues.	
	1f. Assist in the resolution of chrome contamination issues in New Jersey.	

Accountability VI

Secure reasonable and responsible regulations through active participation in the regulation development process.

Measures	Goals	Comments
1. Comment on all substantive regulations proposed by EPA affecting Chemicals.	1a. Comment on organics chemical BAT proposals.	
	1b. Comment on new solid waste rules.	
	1c. Comment on superfund rules.	
	1d. Comment on new asbestos rules.	
	1e. Continue input into PCB rule development.	

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Accountability VII

Contribute to industry positions on regulation, litigation and legislation through participation on trade association committees.

Measures	Goals	Comments
1. Environmental Programs' personnel participation.	1a. Water programs - HSIA, WPCF, NEDA-Clean Water Act.	
	1b. Participate directly in Chlorine Institute Environmental Protection Committee.	
	1c. CMA PCB Panel.	

Accountability VIII

Continue personal and professional growth and development.

Measures	Goals	Comments
1. Participate in training courses to improve management/professional skills.		

Accountability IX

Apply EEO policy to applicable issues involving staff personnel.

Measures	Goals	Comments
1. Discuss EEO as required with staff and peer groups.	1a. No issues involving violation of EEO policy.	