

Vista Chemical Company

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Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

TGG: JCL: MMG: RF
XF: _____

October 10, 1988

Mr. B. I. Raffle
Supervising Counsel
Environmental & Engineering Group
Conoco Legal Department
P.O. Box 2197
Houston, TX 77252

Certified Mail
Return Receipt Requested

VISTA

Mr. H. J. Neeld
Director, Environmental Programs
Environmental Conservation
Conoco Inc.
P.O. Box 2197
Houston, TX 77252

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Return Receipt Requested

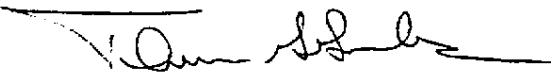
RE: U.S. v. Conoco

Gentlemen:

Pursuant to the Asset Purchase Agreement dated as of July 20, 1984, among E.I. Du Pont de Nemours and Company, Conoco Inc., and Vista Chemical Company, and the Consent Decree entered in the above action, we hereby provide notice of recently-discovered information which may lead to the filing of an Environmental Claim.

On September 28 and October 6, the Vista VCM plant experienced incinerator by passes which resulted in VC emissions above the reportable quantity. The appropriate state and federal agencies were notified. Please contact me if you have any questions regarding this matter.

Sincerely,


Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

dlj

cc W. L. McClain
M. G. Hayes
R. A. Conrad
E. R. Taylor

VVV 000000930

TO: R. D. Gamblin

FROM: T. G. Grumbles
DATE: October 7, 1988

Interoffice
Communication

SUBJ: PROGRESS REPORT

VISTA

1. A meeting of the Product Liability New Product Development Team was held. We have nearly completed the first phase of the revised process and are currently scheduling an executive management presentation.
2. TGG attended an SDA sponsored Proposition 65 compliance seminar.
3. Advised Baltimore regarding the Set III Control Technique Guidelines. The State of Maryland will be required to revise their state rules requiring plants to implement a fugitive emission control program.
4. Advised Blane regarding hazardous waste rules. Arranged expedited waste approval at Chemical Waste Management.
5. JCL was Program Chairman for the annual Vinyl Chloride Safety Association meeting September 22-23.
6. The Environmental Careers Team met September 28 and met again by conference call on October 5 to finalize recommendations.
7. Arrangements were made for a series of meetings with European contacts to discuss LAB/LAS.
8. The Vinyl Institute Health, Safety, and Environment Committee met to review the status of VCM regulations.
9. The official transfer of data input and production of OSHA labels was completed on Wednesday, October 5. Zac Mendenhall will be responsible for label orders and production, and Jackie O'Connell will be responsible for the data base.
10. Requested TSCA certifications from 95 companies for over 450 chemicals on September 1, 1988. As of October 1, 59 companies had responded. On October 15, a second letter will be sent to those who have not responded.
11. Provided clarification of the FDA, definitions for white mineral oil, odorless light petroleum hydrocarbons, technical white mineral oil, and mineral oil to Wayne Sorenson. He is going to pursue the testing of all Vista solvents under the white mineral oil definition.

VVV 000000931

R. D. Gamblin Memo
October 7, 1988
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12. Received copies of three CMA films, titled, "First on the Scene", "Teamwork", and "The Emergency Response Guidebook: A Tool for Safety". These will be shown at the Annual Industrial Hygiene meeting in November. Anyone desiring to see or use these films should contact MMG.

A handwritten signature in black ink, appearing to read "T. G. Grumbles". The signature is written in a cursive style with a horizontal line extending from the end.

T. G. Grumbles

dlj

VVV 000000932