

Vista Performance Polymers
A Division of
Vista Chemical Company

751 North Main Street

Mansfield, Massachusetts 02048-1432
Phone (508) 339-4551

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VISTA

August 5, 1992

TO: Don Langshaw ----- BP Americas
Tom Wilkes ----- BP Performance Polymers
Brian Kanzler ----- Reichhold Chemical
Kevin Kirkpatrick ----- Hercules
Lynn Zimmerman ----- Vista Chemical
Veldon Messick ----- Vista Chemical

FROM: George D. Williams

SUBJECT: Phase IIA Investigation
Mansfield Massachusetts Property

The purpose of this memo is an attempt to return Phase IIA investigation to a productive program. As a matter of review, the following events have occurred in 1992:

- Site team met on February 5th. and developed a Phase IIA scope. It was designed as a step wise program with field decisions on borings and monitoring wells as visual observations dictate.
- CH2M Hill submitted estimate on February 24th. with a projected cost of \$83,877, if all field work was required. Transmitted to participants on February 28th. with a deadline to respond by March 10th.
- BP Americas put project on hold on March 10th.
- BP Americas and Reichhold negotiating their positions from March 10th. to July 1st. and a revised scope submitted.
- Vista and CH2M Hill considering scope change proposal.

My response to BP Performance Polymers is attached. I am concerned with the delay being experienced and further propose that Phase III be initiated on the lagoon, rosin pit and rail-spur areas which are essentially complete.

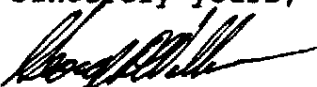
VEV-488080

Phase IIA Investigation
Continued

CH2M Hill is not in a position to perform additional work for us without a workorder authorization as the expenses of delay have become prohibitive.

You may have noted that Veldon Messick has replaced Joe Ledvina as a team member, as Joe has been reassigned to another responsibility. Welcome aboard Veldon!

Sincerely yours,

A handwritten signature in dark ink, appearing to read "George D. Williams", written over the typed name.

George D. Williams

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August 5, 1992

Mr. Thomas E. Wilkes
Manager H.S. & E.
BP Performance Polymers
Newburg Road
P.O. Box 400
Hackettstown, New Jersey 07840

REFERENCE: Mansfield Site - Phase IIA Study

Dear Tom,

I am very concerned with the delay in project progress that the BP/Reichhold negotiations have caused. As Vista Performance Polymers is the responsible party in the eyes of the State of Massachusetts, it is we who have the most to lose. If agreement cannot be reached, we may find it necessary to proceed without your participation in the study and remediation.

My response to the eight (8) points in Don Langshaw's letter of May 19th. are as follows:

- (1) CH2M Hill has already agreed that labor rates for Phase IIA would be in accord with the Vista agreement. However, the contract further allows them to adjust rates with 30 days notice to Vista. They have not done so and the rates will hold if we promptly proceed.
- (2) Eliminating Senior Review in hydrology for a savings of \$624 is unacceptable as your alternative proposal would have the preparer reviewing his own work. This is poor project control.

VEV-488082

Phase IIA Study
Continued

- (3) (a) Reviewing all TIC information available in the rosin pit area seems advisable. I believe that Phase III will conclude that no major remediation is required in this area. Such a decision on our part will receive close scrutiny by the State reviewers and we should have minimum holes in our data to support our position.
- (b) Senior review is considered good practice and should not be eliminated.
- (4) It was never the intent of the group to allow the installation of five monitoring wells in Area 4 but to field evaluate the situation as it developed. There are in reality two issues in this area separated by several 100 yards and require different actions.
 - (a) Contamination near an underground storage that was closed in 1986 was detected by a boring and suggested free floating liquid contamination. It would appear that the tank was improperly closed and there is no record that contaminated soil was removed in 1986. It is my recommendation that reclosure be assumed and the Phase III decision and only three borings and no monitoring wells be installed. The purpose of the borings would be to provide an estimate of volume and TCLP data so that an estimated cost of reclosure can be made. It is possible that at a later date, a monitoring well in the area may be required to track our success in closure.
 - (b) Contamination was detected, via boring, that phthalate contamination still exists where tank trucks were once unloaded. Since we were directed on September 5, 1985 by DEP to remove known contaminated soil from the area, I believe we remain obligated to remove the soil on our side of the fence. I recommend no monitoring well in this area but two borings to estimate volume and TCLP. In this case also, we may need a monitoring well later.

Phase IIA Study
Continued

(5) Area 6 - South Leach Field

- (a) I would also like to avoid too extensive a soil gas study and would recommend that BP be present on the site to assist in determining when enough information has been gathered. I don't believe it is possible at this time to unilaterally limit the study to an absolute two days.
 - (b) Three monitoring wells, three soil borings and one piezometer may be overkill but we will not know until the soil gas results are available. Again, I recommend that BP be present at the site during this part of the study to assist in the field planning.
- (6) Risk Assessment cost can be reduced if we assume remediation of both Area 4 problems discussed in (4) above. However, there is still Risk Assessment for Area 6. Again, I do not agree with eliminating senior review.
- (7) We did not ask CH2M Hill to submit a bid for Phase IIA. We requested a cost estimate of a project scope that the group agreed to. Cost estimates are compensable to an engineering contractor but bids are not. CH2M Hill should be compensated for the estimate and their responses required due to this delay by BP.
- (8) The cost of preparing the report is billed on time spent. The estimate assumed that we would require a report of equal quality to the Phase II report. Based on comments to me by team members, perhaps even a better report is expected for Phase IIA.

In summary, I recommend that CH2M Hill be approved to begin work based on BP presence during key parts of the investigation to agree to field changes. I perceive that BP fears that project cost is not under their control and on-site presence should satisfy this concern. I also recommend that Phase III begin on areas completed in an attempt to recover the time lost this summer.

Phase IIA Study
Continued

If agreement cannot be reached via this response, I recommend that the group reconvene in September to redo the scope to the satisfaction of all participants.

As to contacting your Mr. Wilber, we have already submitted a proposal dated April 6th. and await BP's reply.

Sincerely yours,



George D. Williams,
Plant Manager