

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

REQUEST:

RESPONSE: Plant records show that there were 5 times between June 1, 1981 and March 1, 1982 in which ~~main~~^{PIPES} ~~lines~~ were pulled for cleaning. All of these occurred in 1981. There are no work orders for these jobs because all 1981 work orders have been discarded. However, the time and date are well documented in the production reports. Information available on these items includes production reports, remarks in the monthly progress reports, and a work order listing.

The only written guidelines for burning out of lines is contained in a hand written memo from A. H. Gatter to J. P. Windham dated 3/23/82.

REQUEST FOR PRODUCTION NO. 2

REQUEST:

RESPONSE: Information on work orders and specifications are given in the response for Request for Production NO. 1. All pipe cleaning has been done by Amoco personnel and no other contractors have been involved.

REQUEST FOR PRODUCTION NO. 3

REQUEST:

RESPONSE: Conoco keeps extensive records on exposure to vinyl chloride. This includes over 5,700 samples per day of ambient air in the process area, personnel monitoring of each employee in the vinyl area several times a year, and many other special samples, etc. There are also other records on lead and particulates. All of this information is not relevant to the case in question. Conoco also has records from 1977 to present on telephone conversations with individuals who have called to inform or complain about certain situations. These include conversations about noise, dust, bomb threats, and odors.

There are also ~~reports~~^{documents} dealing with an irritating odor mainly from the Bioparks. A listing of these is given in the response to Request for Production No. 4.

REQUEST FOR PRODUCTION NO. 4

REQUEST:

RESPONSE: Corcoo does extensive laboratory testing of air for ~~mercury, lead, and particulates~~. Waste water is also extensively ^{monitored} in order to insure compliance with the plant's wastewater permit. The soil in the plant has also been extensively tested, mainly in conjunction with soil borings for construction. All of the above information is voluminous and ~~totally~~ irrelevant to the case. There have been laboratory testing, studies, reports and correspondence dealing with irritating odors often associated with the bioponds. A listing of these is below.

Document NO	TITLE	DATE
#1	HAND WRITTEN NOTE FROM 6-28-77 MTG BY AHS	6/28/77
#2	CHEMICALS RESEARCH MONTHLY PROGRESS REPORT	7/10/79
#3	ANALYTICAL RESEARCH SECTION APRIL SUMMARY	4/77
#4	LETTER FROM R.M. OWENS	6/19/79
#5	HAND WRITTEN ENGINEERING REPORT BY PFF	NO DATE
#6	LETTER FROM REBECCA CHEN TO L.W. CRESSWELL	6/21/79
#7	MEMO FROM DOUGLAS MICHELS TO C.L. MILLER	10/9/78
#8	MEMO FROM L.W. CRESSWELL TO C.L. MILLER	5/3/79
#9	TSR-420-77-848-0 FROM R.E. CALAMY	4/21/77
#10	HAND WRITTEN REPORT FROM J.F. PEREZ-VEIASIO TO JIMMY MCCORMAN	8/10/79
#11	MEMO FROM L.W. CRESSWELL TO C.L. MILLER	12/17/79
#12	TRIP REPORT FROM JOHN R. DODD TO CHARLES M. STARKES	9/10/79
#13	MEMO FROM JOHN R. DODD TO CURRY L. MILLER	12/14/79
#14	MEMO FROM C.L. MILLER	10/11/78
#15	NOTES ON SAMPLES FOR PYD STUDY	N/D DATE
#16	MEMO FROM L.A. EVANS TO R.A. FROMHEICH	11/5/79
#17	MEMO FROM J.J. HALL	9/11/78
#18	MEMO FROM J.H. MCCULLEY TO C.L. MILLER	10/10/78
#19	NOTES FROM 9/17/79 MEETING BY R.A. FROMHEICH, ALSO OTHER MATERIAL ON IRRITANT & NPDES PERMIT	8/17/79
#20	MEMO FROM J.P. MCCORMAN	8/29/79
#21	NOTES FROM WASTE WATER MEETING BY R.A.F.	N/D DATE
#22	NOTES BY R.A. FROMHEICH ATTACHED	DTH 000042929 5/1/79

- #23 NOTES BY R.A. FROHREICH 2/6/79
- #24 PROPOSED AGENDA FOR WASTE WATER MEETING 5/10/79
- #25 TOXICITY SEARCH MATERIAL FROM
FLYNT KENNEDY 6/23/77
- #26 HANDWRITTEN MEMO FROM JFH TO DEM 9/6/77
- #27 MEMO FROM J.J. FRANCE TO G.G. DRAPER 6/3/77
- #28 HANDWRITTEN MEMO FROM JFH TO DEM 7/29/77
- #29 HANDWRITTEN NOTES BY JFH 8/16/77
- #30 HANDWRITTEN NOTES BY JFH NO DATE
- #31 HANDWRITTEN NOTES BY JFH 8/30/77
- #32 HANDWRITTEN BIOTESTS LOG BY JFH 1977
- #33 HANDWRITTEN OXYGEN CONSUMPTION TESTS BY JFH NO DATE
- #34 QUOTE FOR ENGINEERING SERVICES BY 9/13/77
B.C.T.C.
- #35 NOTES BY JFH NO DATE
- #36 MEMO FROM J.L. IRVINE TO JOHN
HENRY 9/21/77
- #37 PLOT PLAN
- #38 PLASTICIZER WASTEWATER OPERATING
PROCEDURE BY J.F. HENRY 9/15/77
- #39 DATA BY JFH NO DATE
- #40 NOTE TO JOHN HENRY BY W.M. McNUTT NO DATE
- #41 NOTE FROM JFH TO DEM 2/4/77
- #42 CALCULATIONS BY JFH
- #43 T-460 HEATER SPECS & NOTES 8/26/77
- #44 ESTIMATE T-460 IMPROVEMENTS 9/19/77

- #45 QUOTE 9/26/77
- #46 T-460 OPERATION 9/28 - 9/30/77 9/30/77
BY JFH
- #47 API SEPARATOR OPERATING PROCEDURE 2/15/77
BY JFH
- #48 TELEPHONE CONVERSATION NOTES BY JFH 12/9/77
- #49 PURCHASE ORDER FOR H_2O_2 2/1/78
- #50 NOTES ON DYE TRACER RESULTS 1/26/78
- #51 MEMO FROM JOHN L. IRVINE TO 3/21/78
D.C. KERFOOT WITH PATENT
- #52 LAB OBSERVATIONS AND NOTES 7/11/77
- #53 LAB WORK REQUEST 2/10/77
- #54 REMARKS ABOUT POND IRRITANT IN
PROCESS REPORTS FROM 1976 TO 1982
- #55 MEMO FROM L. W. CRESSWELL TO 7/14/80
R. A. FROMMELT
- #56 MEMO FROM JOHN R. DODD TO 10/10/79
CURRY L. MILLER AND CHARLES L.
SANDERSON
- #57 MEMO FROM JOHN R. DODD TO 11/5/79
CURRY L. MILLER
- #58 MEMO FROM ROBERT M. OWENS TO 5/18/79
CHARLES M. STARKS
- #59 MEMO FROM L. W. CRESSWELL TO 5/18/79
C. L. MILLER
- #60 MEMO FROM L. W. CRESSWELL TO 2/23/79
C. L. MILLER

- #61 NOTES ON POND IRRITANT NO DATE
- #62 MEMO FROM JFH TO RBM 6/13/77
- #63 MEMO FROM J.J. FRANCE TO
G.G. DRAPER 6/3/77
- #64 MEMO FROM JJF TO KWC, RGG 5/20/77
- #65 NOTE FROM JJF TO RBM, DEM, ELK 4/13/77
- #66 CHROMOTOGRAPH PRINT OUT NO DATE
- #67 NOTES BY JVV NO DATE
- #68 NOTES BY JVV NO DATE
- #69 NOTE FROM R.B. MARTIN TO
GENE SET ZKORN 3/24/77
- #70 NOTES, DESIGN WORK, AND ESTIMATES 1979
FOR IRRITANT CONTROL
- #71 1980 CAPITAL BUDGET WRITEUP 1979
- #72 AFE REQUEST - PLASTICIZER IRRITANT 12/4/80
CONTROL

REQUEST FOR PRODUCTION No. 5

REQUEST:

RESPONSE: The Aberdeen Plant is continually reviewing the safety of the operation and the safety of employees. There are many studies on safety that have been performed by union, however, none of these are relevant to the case that have not already been given in request for production No. 1 and No. 4

REQUEST FOR PRODUCTION NO. 6

REQUEST:

RESPONSE: There are no studies, recommendations, plans for operation or other documentation concerning UNOCO's regulation or monitoring of hazardous materials relevant to the case that have not already been given in Request for Production No. 1 and No. 4

REQUEST FOR PRODUCTION NO. 7

REQUEST:

RESPONSE: There are aerial photographs of the plant which are provided.