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Interoffice Communication

To : M. J. Schneider
From : V. E. Messick
Date : November 14, 1983
Subject : POTENTIAL ENVIRONMENTAL LIABILITIES

In addition to the liabilities mentioned in the attached letter from R. A. Frohreich dated November 11, 1983, the items listed below are potential liabilities.

1. Any groundwater contamination due to plant superfund sites, bioponds, API separator leakage, underground tank leakage etc. that may have occurred or that may occur prior to closure. Liability for future groundwater contamination from superfund sites or from other buried material should remain with Conoco.
2. Groundwater contamination from local landfills or from hazardous waste landfills in which plant waste was sent prior to closure.
3. Any city water contamination due to backflow that may have occurred or may occur prior to closure.
4. Any liability due to failure to keep commitments to any federal, state, or local authority or agency.
5. Any liability due to improper disposal of PCB contaminated material in the past.
6. Any liability due to hearing damage to personnel prior to closure.
7. Any liability due to overexposure of personnel to VCM, lead, asbestos or other chemicals used in the plant prior to closure.
8. Any liability due to failure to keep proper records or report items prior to closure.
9. Any liability due to failure to administer the TOSCA 8E regulations properly.
10. Any liability due to products produced at the plant prior to closure.

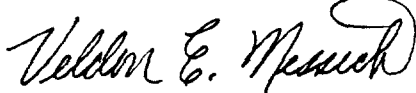
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11. Any liability due to toll processing TOTM plasticizer or phthalic anhydride prior to closure.
12. Any liability due to material discharged from the plant through process or storm water prior to closure.
13. Any liability due to odors, noise or other nuisance items prior to closure.

There also may be other items of which plant management is not aware of that may be liabilities. These items should remain with Conoco.



Veldon E. Messick
Senior Process Engineer

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Attachment

c: JF, RAF, DLM

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