



Interoffice Communication

To R. A. Frohreich, Aberdeen Chemical Plant

From E. S. Wackerbarth, Legal, Houston

Date September 20, 1982

Subject REPLY TO MISSISSIPPI DNR REQUEST FOR INFORMATION -
ABERDEEN PVC PLANT

I have reviewed your draft response to the DNR and I believe that you, Joe Ledvina and I will need to discuss it in light of our recent experience in replying to EPA Region VI's 114 letter. I have attached a draft of a letter and a format for the reply text that should be a good starting point for your next draft. I will call you in a week or so to discuss a meeting at which we can go over the draft in a thorough manner. In the meantime, please feel free to call me if you have questions about the format I am suggesting for the reply.

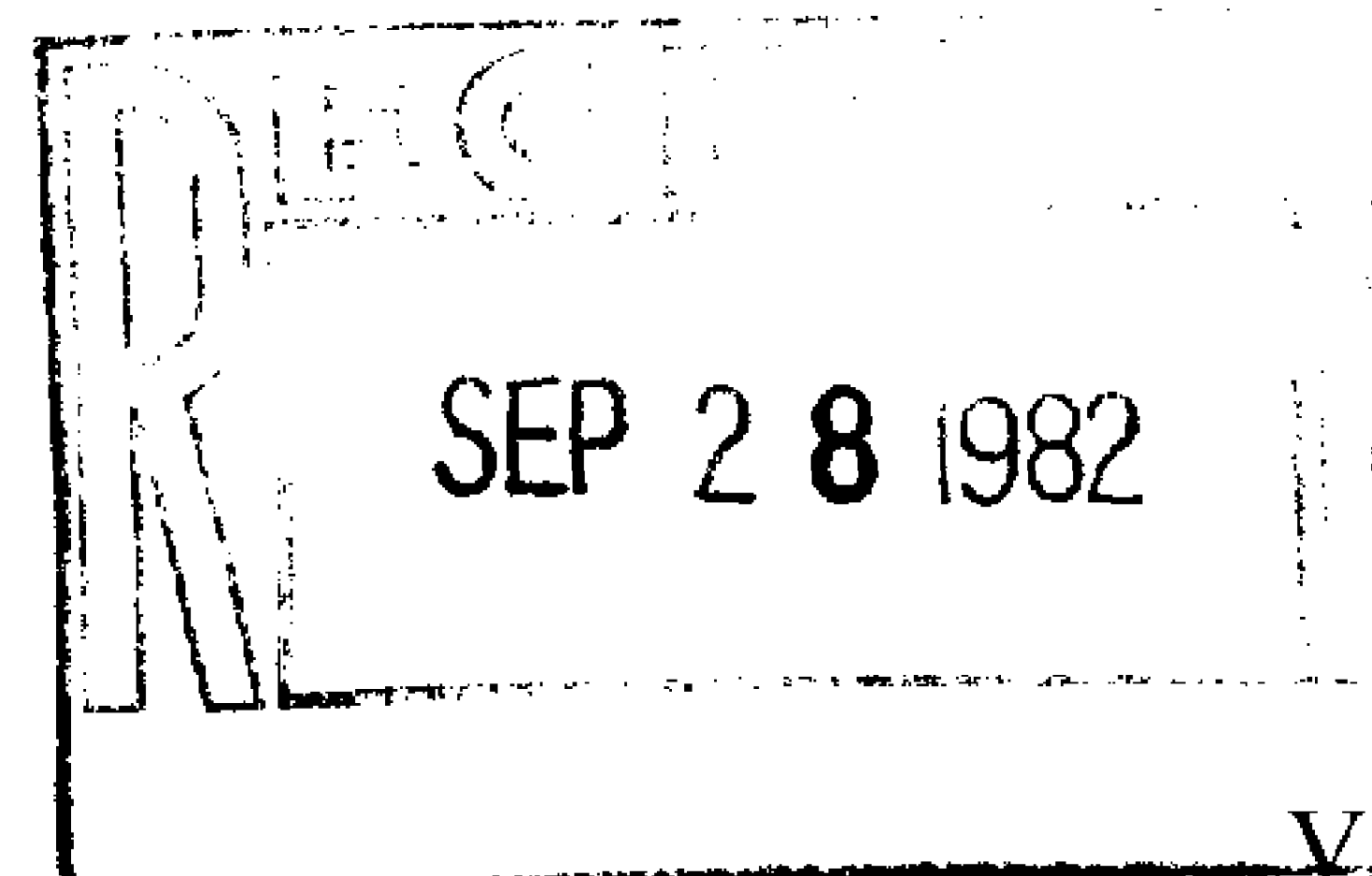
Estela S. Wackerbarth

Attorney

sdw (By: Idw)

Attachment

cc: J. Ledvina



VAB.0001144354

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Mr. Jerry B. Banks, P.E.
Mississippi Department of
Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39204

This letter and the attached reply text respond to your verbal request of (Date) for information about Conoco's Polyvinyl Chloride Plant in Aberdeen, Mississippi.

I believe you will agree that the Aberdeen PVC Plant has taken all reasonable steps to prevent the potential for releases of vinyl chloride. Please do not hesitate to call me if I may provide additional information.

VAB.0001144355

CONFIDENTIAL

REPLY TEXT

TO

MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
REQUEST

CONOCO ABERDEEN PVC PLANT
ABERDEEN, MISSISSIPPI

VAB.0001144356

Format for Reply Text

1. Give a concise description of the PVC manufacturing process, just to make sure Banks knows the process as it is carried out at our plant, and any terminology we use in the reply text.

2. Separate each incident with headings such as:

February 2, 1979.

3. Describe events leading up to each release. Refer to figures, (if you've got them as parts of process descriptions) or to process descriptions so that you need not go into details of the process each time.

4. Tell how many pounds of vinyl were released if Banks asked for that information. If he asked for this information, you may want to use this phrase:

"The relief valve sizing equations in the consolidated valve Catalog No. 1900B, page 47, (or other appropriate reference) indicates that approximately _____ lbs of vinyl would have been released _____."

5. Describe the corrective actions, including (a) counseling of the operator if there was operator inattention or error involved, (b) changes to O/M procedures, (c) physical changes to plant, (d) training sessions held for employees, and (e) changes to written manuals or written directives to all employees, etc. Give dates of completion of measures.
6. Tell why the release COULD NOT HAVE BEEN prevented. This is important if we are to head off a possible lawsuit. If there were other upsets, weather conditions, etc. that required attention at the time of the release, describe them and tell how they affected response to overpressure conditions leading up to each release.
7. In general, use phrases like "event of (date)", or "incident of (date)", instead of "discharge of (date)". Say that the relief valve "lifted", instead of "discharged".