

To: Distribution

From: Jim Rutledge
Date: April 23, 1986

Interoffice
Communication

Subject: Revised If-Needed Statement for Lake Charles Groundwater
Quality Assessment

The attached document revises and supersedes the previously approved if-needed statement on the Lake Charles groundwater quality assessment, dated 12/9/85. All copies of the previous statement should be destroyed and replaced with the present version.

Reason for the revision is that Conoco and Vista have submitted an extensive report of work to date to the DEQ, including recommendations for further evaluation steps.

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VHR 5192

If-Needed Statement

**Groundwater contamination
Lake Charles Chemical Complex**

Date approved for use: [DRAFT ONLY] 4/23/86

A preliminary groundwater quality investigation was initiated in early 1984 at the Conoco Chemicals complex in Westlake, La. Groundwater contamination was discovered beneath the site during routine monitoring. Preliminary notification was made to Louisiana's Department of Environmental Quality at that time. A plan for a more detailed groundwater quality assessment was developed and submitted to the DEQ.

The plan was approved and is now being implemented by Vista Chemical Company, which purchased the Westlake complex from Conoco in July 1984. To date, over 67 monitoring wells have been installed and sampled for the assessment.

We are still in the process of evaluating the situation, but so far the evaluation shows no evidence of endangerment to human health or the environment.

On April 23, 1986, Conoco and Vista presented an extensive report to the DEQ which detailed all work conducted to date, and proposed further evaluation steps and a pilot remedial action program for DEQ approval.

Use the following material only in response to specific questions from the media:

Q. What is Conoco's involvement?

A. Conoco is involved. If you have specific questions regarding their involvement, you should call Carlton Adams at 318/491-5268.

Q. How is the groundwater being affected?

A. Tests have shown some chlorinated hydrocarbons in underground sand layers beneath the Westlake chemical complex.

Q. How do you know there is no endangerment to human health or the environment?

A. The affected area is within the chemical complex. We have no data to indicate that contamination has left the boundaries of the chemical complex.

Q. What are the contaminants?

A. Most of them are chlorinated hydrocarbons.

Q. How dangerous are they?

A. Some chlorinated hydrocarbons may increase incidence of cancer when long-term exposure to high levels occurs. We have no evidence of any human exposure to chlorinated hydrocarbons in this situation. An assessment of groundwater quality is currently underway to understand the subsurface geology and hydrology. The extent of contamination will also be studied. Cleanup will be undertaken if such a course proves necessary.

Q. Is the plant still contaminating this area?

A. We won't know that until the groundwater quality assessment is complete.

Q. What are you doing to clean up the contamination?

A. The problem is currently being evaluated. Once we determine the extent of contamination, appropriate cleanup measures will be taken. Any appropriate groundwater cleanup program cannot be properly designed and implemented until we have completed the assessment.

Q. Who is doing the groundwater quality assessment?

A. Vista and Conoco are conducting the groundwater quality assessment program, with Conoco as the lead.

Q. Who will be responsible for cleanup? Who will pay?

A. Depending on the results of the detailed assessment, appropriate remedial actions will be taken. The implementation of any remedial actions will be carried out jointly by Vista and Conoco.

Q. What is a detailed groundwater quality assessment?

A. Our detailed assesement plan includes the drilling of a series of shallow and deep wells and the gathering of subsurface data. This is to determine the extent and levels of contamination, as well as the rate of movement.

Q. How long will it take?

A. The plan has been approved and the assessment is ongoing. We anticipate the assessment work will be completed in about 12 months.

Q. What will happen then?

A. A corrective action plan will be developed and submitted to the Louisiana DEQ. They must approve the plan before cleanup can begin.

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To: Distribution

From: Jim Rutledge

Date: April 23, 1986

Interoffice
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Subject: Revised If-Needed Statement for Lake Charles VCM Plant
Consent Decree

The attached document revises and supersedes the previously approved if-needed statement on the Lake Charles VCM Plant consent decree, dated 5/9/85. All copies of the previous statement should be destroyed and replaced with the present version.

Reason for the revision is that the EPA has now approved the compliance plan submitted by Conoco and Vista.

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Timberway: Gamblin, Grumbles, McClain, Reynolds, Kuhn

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If-Needed Statement
VCM Consent Decree
Lake Charles (VCM Plant)

Date approved for use: [DRAFT ONLY] 4/23/86

Vista Chemical Company voluntarily became a party to a vinyl chloride case filed by the Department of Justice (DOJ) on behalf of the Environmental Protection Agency (EPA) against Conoco. This action was taken to expedite resolution of the case. The DOJ, Conoco and Vista Chemical have signed a settlement Consent Decree for the suit.

The suit related to the requirements of the vinyl chloride regulations as they pertain to Vista Chemical's vinyl chloride monomer plant in Westlake, Louisiana. The plant was purchased from Conoco in July 1984. Shortly before the sale, Conoco and the DOJ signed a Memorandum of Understanding outlining the basis for settlement of the case.

The Consent Decree required Conoco to make a payment of \$100,000 and called for the development of a document outlining past compliance programs and programs for continued compliance with the vinyl chloride regulations. Such a document has been prepared, submitted and approved by the EPA.

The incidents named in the suit were reviewed at the plant after each occurred and voluntary changes were made in both equipment and procedures before the suit was filed. Vinyl chloride emissions of the type mentioned in the suit have been virtually eliminated.

Neither Vista Chemical nor Conoco admitted liability for past incidents, but entered into the settlement as the most appropriate means of resolving these issues and to avoid prolonged litigation.

Use the following material only in response to specific questions from the media:

Q. Give us some background on this issue.

A. A number of lawsuits were filed by the Justice Department on behalf of the EPA against vinyl chloride and polyvinyl chloride producers around the country, including Conoco. The suit stated that emissions of vinyl chloride from Conoco's plant were illegal. The plant has since been sold to Vista Chemical.

Q. Why did you settle the suit?

A. Conoco and Vista Chemical felt that the emissions of vinyl chloride cited by the EPA were in compliance with the vinyl chloride monomer standard issued under the Clean Air Act. The incidents cited in the suit were unanticipated events, for which the standard allows. Each incident was reviewed after it occurred and voluntary changes in both equipment and procedures were made. Emissions of the type mentioned in the suit have been virtually eliminated.

Neither Vista Chemical nor Conoco admitted liability for past incidents, but entered into the settlement as the most appropriate means of resolving these issues and to avoid prolonged litigation.

Q. What is in the compliance plan?

A. The EPA-approved compliance plan contains details of the plant's past, present and future practices and procedures to comply with the vinyl chloride regulations.

Q. What caused the emissions of VCM?

A. Unanticipated operation upsets occurred in the system, causing a momentary vent of VCM into the atmosphere. Changes have been made in the system to improve operations, and emissions of the type mentioned in the suit have been virtually eliminated.

Q. Can't you run you plant without emissions?

A. There is no guarantee we will never have another emission. The emissions cited were unanticipated and we are doing everything possible to prevent future incidents. However, the Vista plant has one of the lowest emissions frequency records in the VCM industry.

Q. What changes have been made to improve the process?

A. Equipment has been installed to control emissions of the type cited by the EPA. In addition, changes in start-up and shutdown procedures have been made and employees have been trained in those procedures.

Q. How dangerous were these releases?

A. VCM is not harmful to the environment and is not acutely toxic in the concentrations which resulted from the emissions. Since it is a gas, it dissipates quickly into the atmosphere, leaving little or no residual material in the surrounding area. Because of its low solubility in water, VCM would not be absorbed in appreciable amounts in natural water sources.

Q. What about your employees' safety?

A. There is a fixed-point monitoring system in the plant which continuously checks for levels of VCM in the air. Also, individual employees are monitored on a scheduled basis for exposure to VCM, and employees receive periodic physical examinations, which could detect possible exposure symptoms. If there were any potential danger to employees or the general public, these systems would have indicated such and proper actions would have been taken.

Q. Isn't VCM a carcinogen?

A. Studies indicate long-term exposure to high levels of vinyl chloride may increase incidence of a rare liver cancer in humans. It is our practice to minimize employee exposure and to comply with all OSHA standards regarding VCM exposure.

Q. Why didn't you notify the local community of these releases?

A. There was no danger to the public or the environment as a result of the cited releases. If the public had been endangered in any way by these releases, the company would have taken measures to notify the proper authorities.

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VHR 5199