

~~TGG:~~ JCL: ~~MMG:~~ RF
XF: ND

TO: D. A. Kuhn

FROM: T. G. Grumbles
DATE: August 8, 1986

Interoffice
Communication

SUBJ: VISTA ENVIRONMENTAL POLICY

VISTA

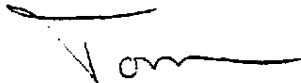
I would like to proceed with gaining the approvals necessary to publish a Vista environmental policy. As we have discussed, I have had requests from several plants to do this, and it is certainly consistent with the company values statement and recent quality program.

The addition of Item 7 on the attached is necessary for many reasons including those below:

1. Tort liability
2. RCRA liability
3. Strict product liability
4. This is becoming industry practice
5. Vista is seeing clauses in our purchase contracts that verify other manufacturers practices in this area.

We can discuss these reasons if you wish. The plant environmental directors have reviewed the policy and approved.

Please let me know how to proceed.


Thomas G. Grumbles

ajo/9

Attachment

VVV 000015398

VISTA

ENVIRONMENTAL POLICY

The Company's activities have an impact on the environment in which it operates - the Company shall conduct all operations in a lawful and environmentally responsible manner. Specifically, the Company shall:

- 1 Comply fully with all environmental laws and regulations related to environmental quality in all of its activities.
- 2 Routinely review its products, processes and control facilities as new information becomes available to improve environmental quality beyond what is legally required, where such improvements bear a reasonable relationship to their costs.
- 3 Maintain an environmental quality assurance program to ensure that operations are in compliance with Vista Chemical's policies, permit limitations, and other regulatory requirements.
- 4 Determine that each new ^{or} existing product can be made, used, handled, and disposed of safely with adequate environmental and public health protection.
- 5 Minimize waste generation and dispose of it using practices that protect the environment and public health.
- 6 Inform employees, customers, carriers, contractors, government agencies, and the public of the health or environmental hazards of the chemicals it makes, uses, or sells.

VVV 000015399

7. Will not knowingly sell product to a customer who is using the product in a manner not intended by the manufacturer.

To: FILE

From: R. A. Frohreich

Date: August 11, 1986

Subject: SUPERFUND REPORTING

Interoffice
communication

VISTA

At 1:30 p.m. on August 8, 1986, I called the National Response Center (1-800-424-8802) to report a vinyl chloride release. Petty Officer Wallace accepted the call. He asked for my name, name of the company, and the location and phone number of the company. He asked the time and date of the release. I responded it was at 10:30 a.m. on August 8, 1986. He asked if the release was to the atmosphere and I replied yes. He asked the size of the release and I told him fifty pounds. He asked the cause of the release and I told him a valve on a polymerization reactor containing vinyl chloride opened when it should not have and allowed vinyl chloride to enter another reactor which was open to the atmosphere. He asked what was done to stop the release and I told him the valves on the reactors were closed. I told him the duration of the release was only four to five seconds. He asked if I had informed the State and I told him I was going to call them as soon as I hung up.

At 1:36 p.m. on August 8, 1986, I called for Jerry Banks of the Mississippi Bureau of Pollution Control to inform him of the incident. Mr. Banks was out of the office and Dwight Wylie accepted the call. I related the details of the incident to him. Mr. Wylie asked if I normally followed a phone report such as this with a letter. I told him no and that the call was just to advise Mr. Banks of the incident and that he be aware of it in case he received a call from Atlanta. He said he would pass the information on to Mr. Banks and Jerry would call if he had any questions.

R. A. Frohreich

R. A. Frohreich
Director of Environmental Control

rah

cc: JF, JWW, DWH, VEM, JCL, WLM, TGG

VVV 000015400

TGG: ~~del~~: MMG: (RF)
XF: Notice Letter

August 8, 1986

VISTA

Mr. B. I. Raffle
Supervising Counsel
Environmental & Engineering Group
Conoco Legal Department
P.O. Box 2197
Houston, TX 77252

Certified Mail
Return Receipt Requested

Mr. H. J. Neeld
Director, Environmental Programs
Environmental Conservation
Conoco Inc.
P.O. Box 2197
Houston, TX 77252

Certified Mail
Return Receipt Requested

RE: U.S. v. Conoco

Gentlemen:

Pursuant to the Asset Purchase Agreement dated as of July 20, 1984, among E.I. Du Pont de Nemours and Company, Conoco Inc., and Vista Chemical Company, and the Consent Decree entered in the above action, we hereby provide notice of recently-discovered information which may lead to the filing of an Environmental Claim.

On August 8, 1986, the Vista Aberdeen Plant experienced a superfund release which resulted in VC emissions. A transcript of the call to the NRC is attached. Please contact me if you have any questions regarding this matter.

Sincerely,



Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

ajo/9

cc W. L. McClain
John Friend

VVV 000015401