

Vista Chemical Company

15990 N. Barker's Landing Rd.
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

Handwritten: X-100 LCVCM

April 3, 1986

VISTA

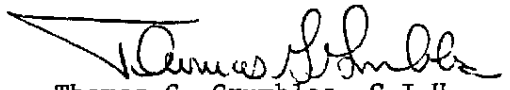
Mr. Jack Neeld
Environmental Conservation
Conoco Inc.
Marland Building
P.O. Box 2197
Houston, TX 77252

Dear Jack:

Conoco was formally notified on December 6, 1985 of a Compliance Order received from the Louisiana DEQ regarding T-405 and T-452 in the Lake Charles Vinyl Chloride Plant. Subsequently, you were sent our response to the compliance order which consisted of a proposed plan to meet the requirements of the order.

Attached is the final order approving our proposed plan. This is a hard copy of the plan faxed to you earlier today.

Sincerely,


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

ajo/8

cc W. L. McClain
B. Raffle - Conoco

VVV 000017151

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

VISTA CHEMICAL COMPANY
ATTENTION: R.A. CONRAD
POST OFFICE BOX 605
WESTLAKE, LOUISIANA 70669

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT
LA. R.S. 30:1051 ET SEQ.

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COMPLIANCE ORDER

This COMPLIANCE ORDER is issued to VISTA CHEMICAL COMPANY (hereinafter referred to as "the Respondent") by the Secretary, Louisiana Department of Environmental Quality (hereinafter referred to as "the Department"), under authority granted by the Louisiana Environmental Quality Act (La. R.S. 30:1051 et seq., hereinafter referred to as "the Act") and particularly by Section 1073 C of the Act.

FINDINGS OF FACT

I.

The Respondent owns and operates a petrochemical plant near Lake Charles, in Calcasieu Parish, Louisiana.

II.

On December 2, 1985 an ORDER was issued requiring the Respondent to cease use of a leaking storage tank and to submit a remedial action plan to address the contamination.

III.

On January 6, 1986 a remedial action plan for the heavy ends reuse storage tanks T-405 and T-452 was submitted to the Department by the Respondent. Subsequent to

VVV 000017152

submittal, inspection of tank T-405 by the Respondent revealed numerous holes in the tank's base, in violation of Section 23.13 of the Louisiana Hazardous Waste Regulations.

IV.

During the month of January 1986, three spill events occurred from the Ethylene Dichloride product storage tank, T-450, adjacent to the reuse tanks. Extent of the spill is unknown, however, the free liquid portion of the spilled EDC was recovered, tank T-450 was emptied, and contaminated soil around the tank was removed.

V.

An inspection by Department personnel on January 30, 1986 confirmed the information in item IV. Additionally, the inspection revealed the probability of groundwater contamination due to a history of spills in this area. Groundwater monitoring wells adjacent to the area indicate contamination in the twenty-five (25) foot and eighty (80) foot sands.

All of the above are in violation of Section 1147 of the Act as well as regulations cited.

COMPLIANCE ORDER

Based on the foregoing FINDINGS OF FACT, Respondent is hereby ORDERED:

I.

To begin, immediately upon receipt of this ORDER, implementation of the following schedule of construction and remediation:

- A. Remove tank T-405 from its base. 4 weeks.
- B. Excavate the base beneath tank T-405 plus one (1) foot, assuming no free liquids are observed. Further excavation will be performed until free

VVV 000017153

liquids are no longer found, plus one (1) foot. Completion of this phase must be observed and approved by a Department representative. 4 weeks.

- C. Construct new base for T-405 which meets all applicable standards of the Louisiana Hazardous Waste Regulations. 15 weeks.
- D. Repair or replace T-405, as required, and install a new base. 7 weeks.
- E. Place T-405 in service. 3 weeks.
- F. Remove tank T-452 from service. 1 week.
- G. Clean T-452 and prepare for entry. 8 weeks.
- H. Inspect T-452 for leaks or structural damage. 2 weeks.
- I. Remove T-452 from its base. Excavate the base as described in item B. 7 weeks.
- J. Construct a new base for T-452 as described in item C. 15 weeks.
- K. Repair or replace T-452, as required, and install on new base. 7 weeks.
- L. Place T-452 in service. 3 weeks.

II.

To submit progress reports to the Department every month or upon completion of each major phase of plan.

III.

To be hereby notified that issuance of this **COMPLIANCE ORDER** does not preclude subsequent imposition of civil penalties in an amount not to exceed \$25,000 per day for each violation described herein.

IV.

To be hereby notified that its refusal to comply with this **COMPLIANCE ORDER**, and the provisions herein, will subject Respondent to possible enforcement procedures under Section 1073 of the Act which could result in the assessment of a civil penalty in an amount not to exceed \$50,000 for each day of continued non-compliance.

VVV 000017154

Done at Baton Rouge, Louisiana, this 15th day of April, 1986.

This COMPLIANCE ORDER is effective on date of receipt.

Patricia L. Norton
PATRICIA L. NORTON, Secretary
Department of Environmental Quality

All correspondence should be addressed to:

Department of Environmental Quality
Hazardous Waste Division
Post Office Box 44307
Baton Rouge, Louisiana 70804-4307

cc: Mr. Richard Coudeau
Acadiana Regional Office
100 Eppler Road
Lafayette, Louisiana 70505

Please serve the Respondent through its Registered Agent for Service of Process:

C.T. Corporation Systems
400 Poydras Street
New Orleans, Louisiana 70130

cc: Vista Chemical Company
Mr. R.A. Conrad
Post Office Box 605
Westlake, Louisiana 70669

VVV 000017155