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Interoffice Communication

To : M. J. Schneider
From : V. E. Messick
Date : November 1, 1983
Subject : ENVIRONMENTAL INFORMATION

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Attached is a list of environmental permits that will have to be transferred in the event of a LBO. Listed below are other items concerning the environmental program at Aberdeen.

Potential Liabilities/Commitments

1. Under Superfund legislation, the plant submitted notification of 4 sites on plant property where plasticizer wastes were previously buried. Several plasticizers are now classified as hazardous. It is estimated that 10,000 cubic feet of plasticizer contaminated material was buried between 1963 and 1979. The Mississippi Department of Natural Resources sampled the sites and requested that the plant submit a landfill management plan and a groundwater sampling plan. These plans were submitted in October 1983. Wells are already in place to obtain the groundwater samples.
2. The plant also believes that plasticizer contaminated wastes were buried at the City of Aberdeen dump between 1970 and 1975. PVC compound and other PVC wastes were buried in the dump between 1963 and 1975. The Aberdeen city dump was closed in 1975 and a HUD housing development is in progress at the site.
3. Plasticizer contaminated waste material as well as PVC and PVC compound wastes have been disposed of at the Monroe County Landfill.
4. Approximately 20 million pounds of PVC resin is buried at wastewater treatment pond 2 here in the plant. The resin in pond 2 contains small amounts of plasticizers and residual VCM.
5. There is approximately 375,000 pounds of material in storage at Prairie from cleanout of the plant's building ventilation system and the vacuum system. This material consists mainly of PVC resin, fillers, dust, PVC dry blend, and PVC compound contaminated with lead stabilizers. Efforts to date to sell this material have not been successful although this effort is continuing.
6. Prior to 1972, wastewater containing PVC resin was discharged directly to James Creek which is located to the west of plant property. Old PVC resin was discovered outside the plant this year and was cleaned up. It is likely that more resin could be discovered at a later date and would need to be cleaned up.

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Potential Liabilities/Commitments (Continued)

7. Beginning in August of 1982, the plant has experienced several waste water bypasses as a result of the plant's sewer system being unable to handle large water flows during heavy rainfalls. Subsequent to these bypasses, the Plant has been required to submit to the State a Waste-water Bypass Prevention Plan. In these reports, the State has been informed that funds for a plant sewer system expansion are being requested in the 1984 Construction Forecast. (Item A-10)
8. As a result of emergency relief valve discharges that have occurred over the past few years, commitments have been made to the EPA and also the Mississippi Bureau of Pollution Control to reduce the possibility of reoccurrence. These commitments mainly include maintenance or procedural inspections or practices. Previous relief valve discharges have led to a show cause hearing and a meeting with the Department of Justice.

Environmental Services

1. The plant uses legal assistance for environmental matters such as renewal of permits, specific environmental incidents, waste disposal contracts and interpretation of environmental regulations. It is estimated that the plant uses 100-200 hours of environmental legal service annually, which would not include any large special environmental items.
2. The plant consults with Engineering and Research Departments in Ponca City regarding operation or improvement of wastewater treatment facilities. It is estimated that the plant uses 80-160 hours annually of this service which does not include large special projects or problems.
3. The plant consults with MED about premature rupture disc failures which have occurred. MED currently inspects discs for evidence of metallurgic and/or physical damage. It is estimated that this service is 50 to 150 hours annually.
4. In 1982, the Mississippi Bureau of Pollution Control requested that a study be conducted to assess potential areas for a vinyl chloride release. A study has been made and is presently under review in the legal department. Sufficient legal involvement will be needed in order to submit the findings of the study to the Bureau of Pollution Control.
5. Information concerning environmental deadlines, new regulations and environmental engineering topics are periodically received from Environmental conservation. This group also provides the plant with the Federal Register Summary. These services will be required to continue a sound environmental program.
6. The plant has applied for a license to operate a radioactive high level alarm on the reactors. Plans are to test the radioactive alarm and if successful, eventually install on all reactors to reduce the possibility of a relief valve discharge. The plant has relied heavily on the expertise from the health physicist in the Medical Division of Conoco on this project. This expertise will be necessary to continue the program to test the radioactive alarm.

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ENVIRONMENTAL PERMITS

<u>Agency</u>	<u>Type</u>	<u>Expiration Date</u>	<u>Transferable</u>
Mississippi Bureau of Pollution Control	Air - Includes Particulates & VCM	March 1, 1986	No - Need New Permit
Mississippi Bureau of Pollution Control	Water	March 31, 1986	Yes - Notification Required
Mississippi Bureau of Pollution Control	RCRA Part A Application	N/A	N/A - Must Submit Revised Application