conoco

Interoffice Communication

To : J. C. Ledvina

From : R. A. Frohreich

Date : November 11, 1983

Subject : LBO - POTENTIAL ENVIRONMENTAL LIABILITIES

Listed below are possible environmental liabilities associated with the Aberdeen Chemical Plant that should remain with Conoco.

1. All VCM relief valve discharges and other VCM releases which have occurred or may occur prior to the sale which are in non-compliance with the NESHAPS standard for vinyl chloride.

2. All days the VCM slurry residual exceeded 400 ppm VCM and all such days which may occur prior to sale.

3. All batch water stripper batches that have or may exceed 10 ppm VCM prior to the sale.

4. Any angiasarcoma cases that may develop in past or present workers who were employed prior to the date of the sale.

5. Any angiosarcoma cases that may develop in the community.

6. All incidents reported under Superfund and all that may occur prior to the sale.

7. All NPDES permit violations reported and any that may occur prior to the sale.

8. Any incinerator exhaust exceeding 10 ppm VCM.

9. Any lead or particulate noncompliance that have occurred or occur before the sale.

10. Any problems which may occur resulting from our reactor opening loss calculation to meet this NESHAPS requirement.

11. Any problems which may occur as a result of improper record-keeping or reporting as required by the NESHAPS standard.

12. Any AOL desease that may develop in past or present workers who were employed prior to the sale.

13. Any problem which may occur due to problems with the Leak Detection and Elimination Plan required by the NESHAPS standard.

14. Any health problems which may occur which are related to the irritant.

15. Any health problems resulting from burning out PVC from pipes.

16. Any health problems resulting from exposure to chemicals used in the plant prior to the sale.

17. Any drinking water contamination which may occur in the future.

R. A. Frohreich

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Chief Process Engineer

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