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2.31



Interoffice Communication

To : File
From : R. A. Frohreich
Date : June 9, 1982
Subject : SUPERFUND REPORTING

At 12:40 p.m. 6/8/82, I reported a vinyl chloride release to the air to the National Response Center (800-424-8802). Lt. Watts accepted the report. I told him the release occurred at 12:55 p.m. 6/7/82. He said you mean yesterday and I replied yes. I told him the release occurred through the reactor evacuation vent exhaust stack. The cause of the release was the mechanical failure of an actuator on a recovery valve. With this failure the recovery valve was in the open position where as it should have been closed. This situation allowed vinyl chloride from the recovery system to leak into the evacuation header and then to discharge from the evacuation jet exhaust stack. He asked if the problem was corrected and I replied the valve had been repaired. He asked if there was an evacuation and I replied no. He then asked the size of the release and I said we estimated between 3500 and 4000 pounds. He then asked why we waited to report this incident and I replied we were determining the magnitude of the release. He replied "They would be happy to take a report in raw form immediately after an incident". He asked if other agencies had been notified and I told him we were going to report the incident to OSHA.

The weather conditions at 2 p.m. on 6/7/82 were:

Barometric Pressure	29.94
Wind	Out of Northwest
Wind Speed	0 mph
Temperature	92°F

At 12:52 p.m. 6/8/82, I received a call from Ed Hatcher, EPA Atlanta, and he asked if I had just reported a release to Superfund. I replied yes. He asked why we waited so long to report when the Standard says to report immediately. I told him we were determining the magnitude of the release. I asked him if immediate did not mean within 24 hours. He said no, and that immediate meant right away. He said he realized this release was to the air, but if it was a release to water a report after 24 hours would be too late to be able to contain the spill. He said we would likely only receive a nasty letter from EPA for not reporting the incident promptly.

R.A. Frohreich

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c: JF, CRM, PEM, DLM, VEM, JCL