

Vista Chemical Company
Olefins & Vinyl Division

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November 16, 1994

**Mr. Clyde Payne, Area Director
Occupational Safety & Health Administration
Jackson Area Office
3780 I-55 North, Suite 210
Jackson, MS 39211-6323**

VISTA

Dear Mr. Payne:

We have received your letter dated October 24, 1994, and have reviewed the alleged violations. This letter is intended to answer questions related to the alleged violations.

As a point of information, Mr. Chris Turner has been re-assigned to other responsibilities and I, Paul J. Kober, am the current Plant Manager of the Aberdeen facility.

Based on the specific nature of the alleged violations we believe that these alleged violations are the effects of a former, disgruntled employee that worked in the plasticizer (P-1) building.

For the specific case we feel is in question, the employee was treated and/or evaluated by 2 general practitioners, 1 general surgeon, and 2 neurosurgeons. This exhaustive effort was carried out to satisfy the concerns of the employee and to ensure that the best possible medical care was provided.

In all cases of occupational injury, the Vista Chemical Company Aberdeen Plant takes an active role to ensure the employee receives prompt and appropriate medical treatment. Vista makes every effort to work with the treating physician(s) to ensure the prescribed treatments and restrictions are carried out completely. In cases where restricted work activity is permitted by the physician, Vista accommodates these restrictions while providing productive work for the employee.

In the Vista Aberdeen facility, insulating materials have been surveyed to determine where asbestos does and does not exist. Lines insulated with asbestos-containing insulation are identified by a yellow stripe painted on the sheathing, or a red/orange tag with an asbestos sticker. All asbestos insulation, including the asbestos insulation in the plasticizer building, has been encapsulated to prevent the possibility of exposure. Where asbestos removal is required, this work is performed by qualified personnel under the supervision of a trained and qualified supervisor of asbestos abatement.

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To provide verification that the asbestos insulation does not pose a threat for exposure, we have conducted area air sampling in the plasticizer building. Six, eight-hour samples were collected over a three-day period. The results of this monitoring are as follows:

November 2, 1994	P-1 Second Floor	< .004 fibers/cc
November 2, 1994	P-1 First Floor	< .004 fibers/cc
November 3, 1994	P-1 Second Floor	< .004 fibers/cc
November 3, 1994	P-1 First Floor	< .004 fibers/cc
November 4, 1994	P-1 Second Floor	< .004 fibers/cc
November 4, 1994	P-1 First Floor	< .004 fibers/cc

As demonstrated by this monitoring, all results are below detectable limits.

A 20% caustic solution is used in the plasticizer building. This material is transferred into a small day tank (approximately 125 gallons) where it is then piped to reactors as needed. If leaks develop in the piping system, the area operator is responsible for initiating a work order for repair. Repairs of this nature are given priority and personal protective equipment is required.

The plasticizer building is a two-story structure and is well ventilated. In the process area, each floor has three ventilation fans to provide air exchange. The second floor has an additional ceiling exhaust fan located directly above the caustic day tank. The first floor contains two catch tanks which are provided with their own powered ventilation system.

Photographs of the plasticizer area are attached to provide a better understanding of the work environment. These photographs show the typical ventilation fans for the plasticizer building, the condition of piping in plasticizer building, the condition of insulation materials in the plasticizer building, and the methods of identifying asbestos containing insulation.

In summary, we believe that the alleged violations are baseless and untrue. The Vista Chemical Company Aberdeen facility is committed to the safety and health of all persons working within the facility.

Sincerely,

Paul J. Kober
Plant Manager