

Vista Chemical Company

15990 North Barker's Landing Road
Post Office Box 19029

Houston, Texas 77224
Phone (713) 531-3200

Notice letters

February 9, 1988

Mr. B. I. Raffle
Supervising Counsel
Environmental & Engineering Group
Conoco Legal Department
P.O. Box 2197
Houston, TX 77252

Certified Mail
Return Receipt Requested
P25 8136198

VISTA

Mr. H. J. Neeld
Director, Environmental Programs
Environmental Conservation
Conoco Inc.
P.O. Box 2197
Houston, TX 77252

Certified Mail
Return Receipt Requested
P25 8136199

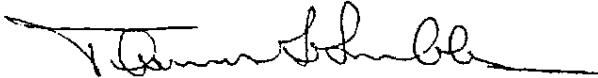
RE: U.S. v. Conoco

Gentlemen:

Pursuant to the Asset Purchase Agreement dated as of July 20, 1984, among E.I. Du Pont de Nemours and Company, Conoco Inc., and Vista Chemical Company, and the Consent Decree entered in the above action, we hereby provide notice of recently-discovered information which may lead to the filing of an Environmental Claim.

On February 5, the Vista VCM plant experienced an incinerator by-pass which resulted in VC emissions above the reportable quantity. The appropriate state and federal agencies were notified. Details were given to Jack Neeld by phone. Please contact me if you have any further questions regarding this matter.

Sincerely,



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

ajo
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cc W. L. McClain
M. G. Hayes
R. A. Conrad

VVV 000000320

vvv 000000321

P25 8136199

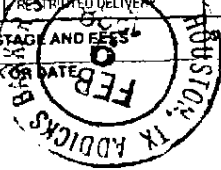
T. Grumbles

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO	
H. J. Neeld, Conoco	
STREET AND NO.	
P.O. 2197	
P.O. STATE AND ZIP CODE	
Houston, TX 77252	
POSTAGE \$	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE
	SPECIAL DELIVERY
	RESTRICTED DELIVERY
	OPTIONAL SERVICES
	RETURN RECEIPT SERVICE
SHOW TO WHOM AND DATE DELIVERED	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	
TOTAL POSTAGE AND FEES	
POSTMARK OR DATE	



T. Grumbles

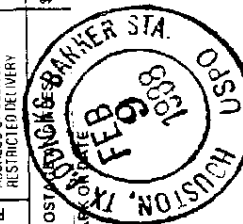
P25 8136199

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO	BRAD RAFFLE, CONOCO LEGAL STREET AND NO. P.O. Box 2197 P.O. STATE AND ZIP CODE Houston, TX 77252	POSTAGE	
CONSULT POSTMASTER FOR FEES		CERTIFIED FEE	
OPTIONAL SERVICES		SPECIAL DELIVERY	
RETURN RECEIPT SERVICE		RESTRICTED DELIVERY	
SHOW TO WHOM AND DATE DELIVERED		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	
TOTAL POSTAGE AND FEES			



PS Form 3800, Apr. 1976

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:	4. Article Number
Mr. H. J. Neeld	P25 8136199
Director, Environmental Programs	Type of Service:
Environmental Conservation	☐ Registered ☐ Insured
Conoco Inc.	☒ Certified ☐ COD
P.O. Box 2197	Always obtain signature of addressee or agent and DATE DELIVERED .
Houston, TX 77252	8. Addressee's Address (ONLY if requested and fee paid)
5. Signature — Addressee	
X	
6. Signature — Agent	
X <i>John Joseph</i>	
7. Date of Delivery	
FEB 12 1988	

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:	4. Article Number
Mr. B. I. Raffle	P25 8136198
Supervising Counselor	Type of Service:
Environmental & Engineering Group	☐ Registered ☐ Insured
Conoco Legal Department	☒ Certified ☐ COD
P.O. Box 2197	Always obtain signature of addressee or agent and DATE DELIVERED .
Houston, TX 77252	8. Addressee's Address (ONLY if requested and fee paid)
5. Signature — Addressee	
X	
6. Signature — Agent	
X <i>John Joseph</i>	
7. Date of Delivery	
FEB 12 1988	

PS Form 3811, Feb. 1986

— 7: 10: 15 RF
OSHA-ETO

TO: Distribution

FROM: T. G. Grumbles
DATE: February 3, 1988

Interoffice
Communication

SUBJ: OSHA ETO SHORT-TERM EXPOSURE LIMIT RULEMAKING

VISTA

On January 21, OSHA promulgated the long expected short-term exposure limit for EtO. The limit is 5.0 ppm as a 15-minute time-weighted average. The standard basically revises the 1.0 ppm 8-hour rulemaking of 1984 to include a 5.0 ppm short-term limit.

Several nuances to the standard. The most obvious is OSHA calls the new limit an "Excursion Limit". This is a new term for OSHA. Their rationale for this is explained in the standard.

Another concern is the applicability of the 5 ppm limit to product exemptions. The 1984 standards addressed EtO residuals in products by allowing exemptions where objective data demonstrated that EtO could not be released to the environment in levels that would create exposures above the action level of 0.5 ppm for an 8-hour TWA. The new rulemaking applies the 5.0 ppm limit to this exemption. In other words objective data must also demonstrate that EtO could not be released to the atmosphere and create 15-minute exposures of 5.0 ppm. We need to evaluate our ethoxylates according to this criteria to be prepared for customer inquiries.

The comment period ends on February 22, with a hearing scheduled for March 3. The standard will probably be final sometime this Summer.

The EOIC will be making lengthy comments regarding the technical content of the standard but not specifically opposing the 5.0 ppm limit. Please let me know if you think Vista should comment.



T. G. Grumbles

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Attachment

cc B. McClain
D. Cohen
C. Matson
J. Friend

DIST: S. Pitts
R. Martin

VVV 000000323