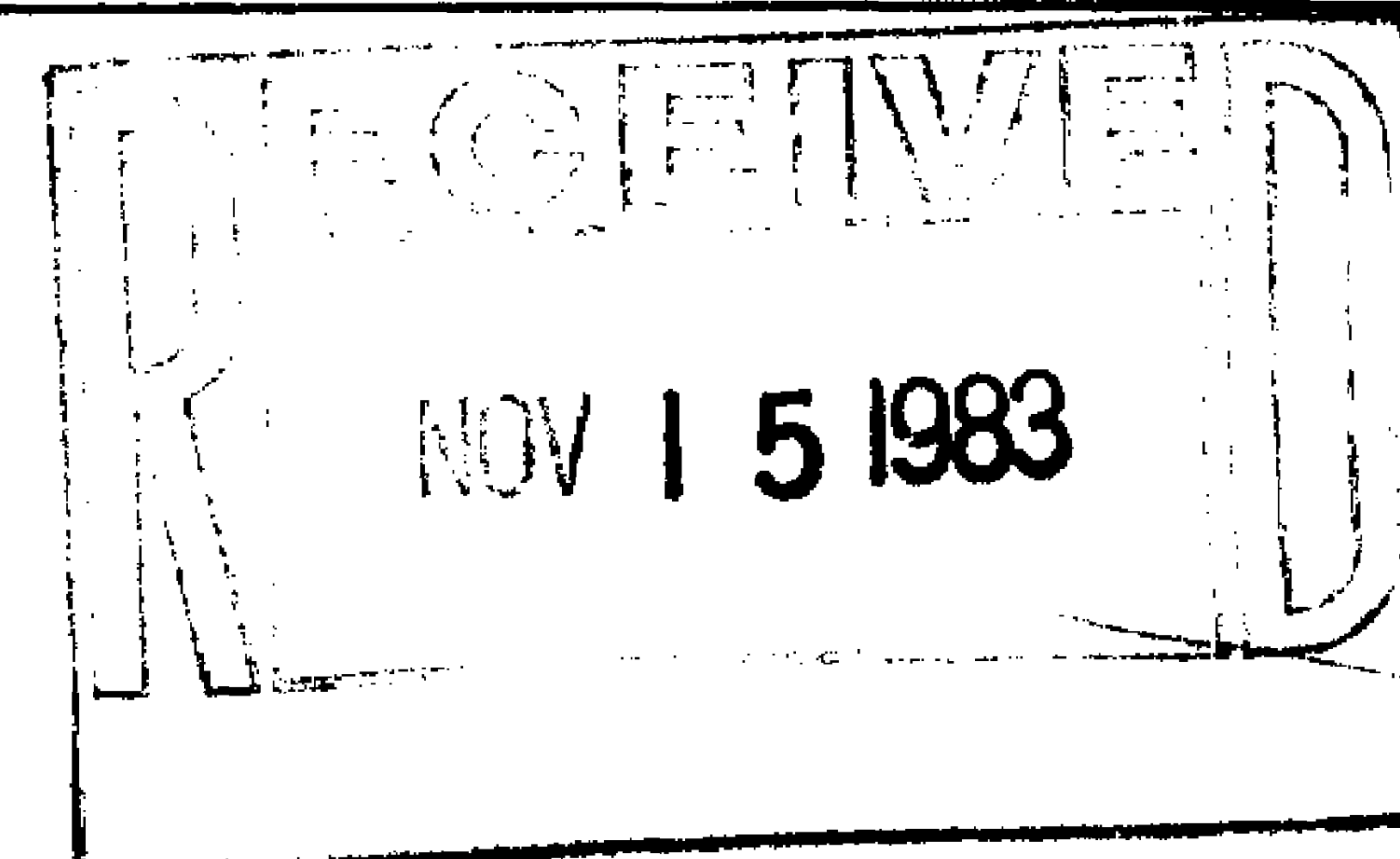


Interoffice Communication

To : M. J. Schneider
 From : V. E. Messick
 Date : November 14, 1983
 Subject : POTENTIAL ENVIRONMENTAL LIABILITIES



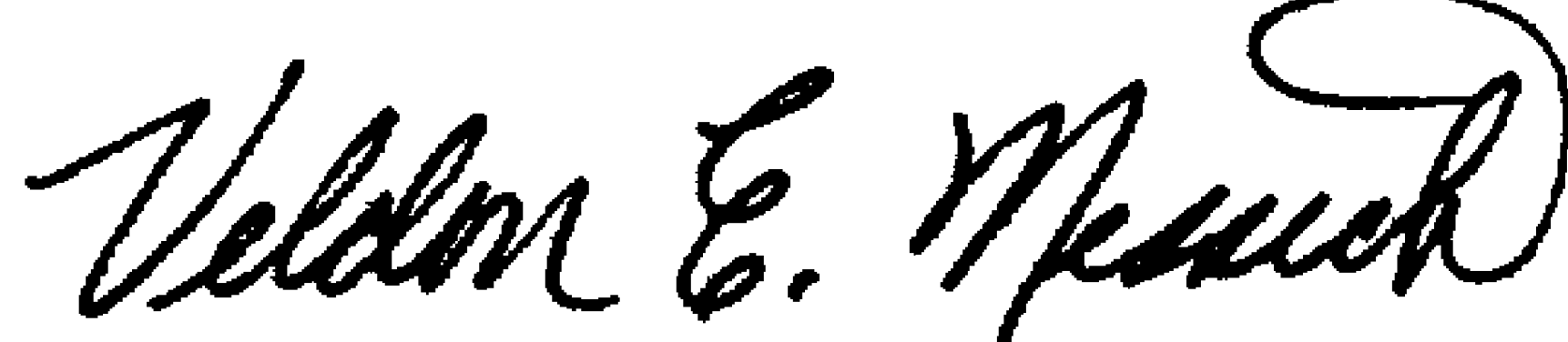
In addition to the liabilities mentioned in the attached letter from R. A. Frohreich dated November 11, 1983, the items listed below are potential liabilities.

1. Any groundwater contamination due to plant superfund sites, bioponds, API separator leakage, underground tank leakage etc. that may have occurred or that may occur prior to closure. Liability for future groundwater contamination from superfund sites or from other buried material should remain with Conoco.
2. Groundwater contamination from local landfills or from hazardous waste landfills in which plant waste was sent prior to closure.
3. Any city water contamination due to backflow that may have occurred or may occur prior to closure.
4. Any liability due to failure to keep commitments to any federal, state, or local authority or agency.
5. Any liability due to improper disposal of PCB contaminated material in the past.
6. Any liability due to hearing damage to personnel prior to closure.
7. Any liability due to overexposure of personnel to VCM, lead, asbestos or other chemicals used in the plant prior to closure.
8. Any liability due to failure to keep proper records or report items prior to closure.
9. Any liability due to failure to administer the TOSCA 8E regulations properly.
10. Any liability due to products produced at the plant prior to closure.

M. J. Schneider
November 14, 1983
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11. Any liability due to toll processing TOTM plasticizer or phthalic anhydride prior to closure.
12. Any liability due to material discharged from the plant through process or storm water prior to closure.
13. Any liability due to odors, noise or other nuisance items prior to closure.

There also may be other items of which plant management is not aware of that may be liabilities. These items should remain with Conoco.



Veldon E. Messick
Senior Process Engineer

bls

Attachment

c: JF, RAF, DLM



A

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 angiosarcoma 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 disease that may develop in past or present workers who were employed prior to the sale.