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April 8, 1988

VISTA

Mr. Richard Read
BP Polymers
Newburg Road
Hackettstown, NJ 07840

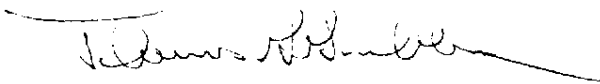
Dear Richard:

This letter is to confirm our conversation this week regarding BP's review of the Weston and Sampson proposal and to provide you a copy of the "If-Needed" statement we have prepared regarding the EC Jordan site-assessment report.

As we discussed, it is essential that we begin to develop the closure plan for the lagoon as soon as possible. This is for multiple reasons, as we discussed, including the seasonal timing of the closure work and avoiding any potential "political" impact on the closure as a result of the EC Jordan report. In general, the sooner we proceed, the less costly an environmentally sound closure will be. Therefore, we ask that you please respond to us by the week of April 15 regarding approval for using Weston & Sampson as proposed.

Also, I have enclosed a copy of an "If-Needed" statement we've prepared to use in the event of public inquiries regarding the EC Jordan report. This statement would not be handed out but will only be used as an internal guide for our responses.

Sincerely,


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

ajo

Attachment

cc E. Kieschnick
J. Ford
W. McClain
R. Flammer
G. Draper

VVV 000009787

If-Needed Statement

Blane Water Problem
Final 4/7/88

We at Blane Polymers are dedicated to minimizing the impact on the environment from our operations. We've studied E.C. Jordan's report to the DEQE, and we're taking steps to further investigate the situation and to eliminate some of the possible hazards mentioned in Jordan's report. We'll be working with and reporting to the DEQE on our progress.

First, we're in the process of permanently closing the retention pond on our property. This involves draining the pond, removing and safely disposing of any potentially hazardous material, and then filling in the pond. We are now working with several specialists in the field to develop specific plans and timing for this project.

Second, the results obtained by E.C. Jordan were higher than those obtained in previous, more rigorous sampling efforts. Because of this, we're arranging to have more samples taken to confirm E.C. Jordan's results. The E.C. Jordan samples, we believe, were taken in a backwater. Some of materials found by Jordan are the same as materials we use in our operations, and we are investigating how they might be finding their way into our discharge line. Because of the way the samples were taken, we believe the Jordan samples were not representative of the river's water and sediment.

Finally, we're doing additional studies of our water-treatment discharges to better understand their impact on the river.

Once these studies have been completed, we'll check with the state and take further remedial action if necessary.

Q. Are you discharging anything other than cooling water into the river?

A. Stormwater from our plant grounds also discharges through the line.

Q. Aren't you concerned that the contaminated river water and pond water could be endangering the health of plant neighbors?

A. Of course we're concerned. However, we believe there is little danger of anyone being harmed at this time. If our studies show that as a possibility, we'll take whatever steps are necessary to cut down the risk until we can permanently close the retention pond. As far as we know now, the Rumford River water is not used as a drinking water supply by anyone downstream. And the Jordan study showed the possibility of harm arising from the pond water to be extremely low.

Q. How do you know that the pond sediment contamination isn't getting into the water supply?

A. Studies we've done in the past indicated little risk of this. However, because of the Jordan study, we're re-evaluating these studies.

Q. Aren't you going to study the groundwater situation? Jordan recommended that you do so.

A. We're evaluating groundwater studies as part of our program to close the pond.