

Handwritten: RE: Notice Letters

November 17, 1986

VISTA

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

Certified - Return
Receipt Requested

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

Certified - Return
Receipt Requested

Re: U.S. v. Conoco (Case No. 83-2518)

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 November 14, 1986, the Vista LC-VCM Plant experienced a by-pass which potentially resulted in VC emissions. The release was reported to the LADEQ as an incinerator by-pass exceeding one hour. During the by-pass chlorine was released in unknown quantities and a Superfund Report was made to the NRC. A transcript of the NRC Report is attached. Please contact me if you have any questions regarding this matter.

Sincerely,

Handwritten signature of Thomas G. Grumbles

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

/are

cc(w/attach):
W.L. McClain
R.A. Conrad
M.G. Hayes

VVV 000000848

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS 1986



PENALTY FOR PRIVATE
USE, \$300

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

**RETURN
TO** ➡

T.G. Grumbles
Vista Chemical Company

(Name of Sender)
P.O. Box 19029

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)
Houston, TX 77224

(City, State, and ZIP Code)



UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS



PENALTY FOR PRIVATE
USE, \$300

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

**RETURN
TO** ➡

T.G. Grumbles
Vista Chemical Company

(Name of Sender)
P.O. Box 19029

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)
Houston, TX 77224

(City, State, and ZIP Code)

VVV 000000849

The following is a recording of a telephone conversation by George Hopkins with the National Response Center on November 13 at approximately 10:05 pm to report a possible release of Chlorine to the atmosphere.

NRC: National Response Center.

GEH: Hello, this is George Hopkins with Vista Chemical Co. I'm calling to notify you of a release.

NRC: Ok, stand by.

NRC: What's your material?

GEH: Chlorine.

NRC: Chlorine or Fluorine?

GEH: Chlorine - C-H-L-O-R-I-N-E.

NRC: Ok, you said you are George Hopkins?

GEH: Yes. I'd like to record our conversation if that is OK?

NRC: Ok. Your company?

GEH: Vista Chemical Company.

NRC: Vista with a V?

GEH: Yes.

NRC: Your title?

GEH: Chief Process Engineer.

NRC: Mailing address?

GEH: P O Box 605, Westlake, LA. 70669

NRC: Area code and phone number?

GEH: (318) 494-5062.

NRC: Is your company the spiller?

GEH: Yes.

NRC: What town did the spill occur in?

GEH: Westlake.

VVV 000000851

NRC: What county?

GEH: Calcasieu Parish.

NRC: Do you have an address or a position of where this happened?

GEH: You mean a street address?

NRC: Street.

GEH: VCM Plant Road.

NRC: What date did this occur?

GEH: Today - November 13.

NRC: The time?

GEH: It began at approximately 2:56 pm. To the best of our knowledge it would have been completed by 4:15 pm.

NRC: So it lasted a little over 2 hours and 15 minutes.

GEH: No, 1 hour and 19 minutes. 2:56 pm until 4:15 pm.

NRC: Give me the first number again.

GEH: 2:56 pm.

NRC: Second figure?

GEH: 4:15 pm.

NRC: Ok, a little bit over 1 hour and 15 minutes.

GEH: Yes.

GEH: Now the release . . .

NRC: Hold on sir, let me ask the questions.

GEH: Ok.

NRC: Is this an air release?

GEH: Yes.

NRC: Ok, what did this chlorine come out of?

GEH: It came out of a stack.

NRC: What kind of stack?

GEH: What do you mean what kind of stack?

VVV 000000852

NRC: A venting stack?

GEH: Yes.

NRC: What is the cause of the release?

GEH: We have a vent gas incinerator that is a control device for Vinyl Chloride.

NRC: Is this a normal operation?

GEH: The Vent Gas Incinerator is a normal operation. We had an upset in our Direct Chlorination Unit which caused the Incinerator to shut down. After the Incinerator shut down that caused the vent gases that normally go through the Incinerator to bypass the Incinerator and go out the stack.

NRC: What was the upset? What caused the upset and what was it?

GEH: We are not totally sure at this time.

NRC: What was the quantity?

GEH: We are not sure of the quantity of Chlorine. It may be greater than . . .

NRC: You don't have to speak so slowly like that you can go ahead and speed up.

GEH: Ok, It may have been greater than the reportable quantity of 10 lbs. We are not sure whether it is or not. We do not expect that even if it is greater than 10 lbs. that it is very significantly greater than 10 lbs.

NRC: Was there any evacuations?

GEH: No evacuations.

NRC: Anybody injured or affected?

GEH: There were two personnel in the operating unit.

NRC: Two employees?

GEH: Yes. Two employees that were exposed to Chlorine . . .

NRC: Hospitalized?

GEH: And hospitalized. They are in observation at this time. They appear to be doing fine.

VVV 000000853

NRC: Ok. what did Vista Chemical do about this release? What kind of methods or actions did they take afterwards?

GEH: We reduced the rates on the Direct Chlorination Unit quickly and cut them back and then shut down the Direct Chlorination Unit. We were able to get the Incinerator brought back up and that eliminated the bypass condition and therefore stopped the release.

NRC: How come this lasted for an hour and 15 minutes?

GEH: The standby unit. . . We have two Vent Gas Incinerators and the standby unit was down for maintenance and we had some problems trying to restart the unit that was automatically shut down by the upset condition.

NRC: Did you notify any other agencies?

GEH: We notified the State DEQ of the Incinerator bypass under LESHAP regulations. We will be calling them again to notify them of the potential Chlorine release.

NRC: Was it a small pinhole leak or was it larger than that?

GEH: It is not a leak. It is a bypass. In other words where we had to vent.

NRC: Bypass vent?

GEH: Yes. Normally, we vent to the Incinerator which combusts all the material in the vent but the upset caused the Incinerator to shut down.

NRC: Ok, does this affect any outside people, any neighbors or people living by?

GEH: No.

NRC: Any other complications?

GEH: No.

NRC: Anything else you want to add?

GEH: Just that. . . oh yes, you also asked if we had notified anyone besides - we also notified an Alert on our red phone system which notifies the other plants and police and Hwy. Patrol.

NRC: How about Fire Dept.?

GEH: I believe that is included in there.

NRC: Ok, anything else you want to add?

VVV 000000854

GEH: Just that we are not sure that we really released 10 lbs. We will be trying to quantify that to find out. It may have actually been less than 10 lbs. But we are reporting it just because it could be possible that it may have been that much.

NRC: Alright.

GEH: We don't believe that this release poses a hazard to the environment but we are reporting in accordance with Superfund regulations.

NRC: You've got to report it then regardless.

NRC: Ok, I'll report this on to the EPA. I'll let them know as soon as we hang up.

GEH: Who am I talking to?

NRC: The last name is Matheson. M-A-T-H-E-S-O-N.

GEH: Ok.

NRC: Alright.

GEH: Thank you.

NRC: Thank you - goodbye.

VVV 000000855