

Circle 4/15

April 1, 1986

VISTA

Mr. Jack Neeld
Environmental Conservation
Conoco Inc.
600 N. Dairy Ashford
Houston, TX 77079

Dear Jack:

As you are aware, Garvin Fryar has written to the OKC, Aberdeen, and LCVCM plants asking that Conoco be notified as soon as practical following any contacts with state or federal agencies regarding VCM releases, incinerator bypasses, etc. Garvin asks that he or Walt Finch be contacted.

In order to assure that notification is given promptly and consistently to Conoco, the following is proposed for those occurrences relating to VCM incident reporting during the compliance period.

Notification of Incident

Conoco will be formally notified as soon as practical of an incident in which VCM reporting is involved via facsimile from Vista's Corporate Environmental Office. (Formal notification to H. J. Neeld.)

Incident Reports to Governmental Agencies

Conoco will receive a copy of the final draft of the incident report to be sent to state or federal agencies in which VCM reporting is involved via facsimile as soon as available. (Copies to H. J. Neeld, G. J. Fryar.)

Agency Requests for Further Information

Conoco will receive a copy of any agency request for further information pertaining to VCM reporting via facsimile immediately upon receipt to VCM reporting via facsimile immediately upon receipt of such requests. (Copies to H. J. Neeld, G. J. Fryar.)

Vista Response to Agency Requests for Further Information

Conoco will receive a copy of the final draft of the response to any state or federal agency's request for further information in which VCM reporting is involved via facsimile as soon as available. (Copies to H. J. Neeld, G. J. Fryar.)

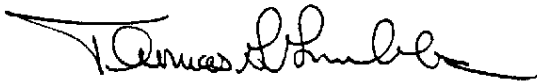
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H. J. Neeld
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April 1, 1986

Note: In the event an incident report or subsequent correspondence involved the Conoco Dock facility. opportunity to review content of the report or correspondence prior to submittal.

We feel the above process will satisfy Conoco's needs to independently analyze the implications of reportable events to Conoco and allows for appropriate joint Conoco-Vista compliance activities.

Sincerely,



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

ajo/8

cc R. A. Conrad
S. H. Christiansen
R. T. Ferrell
J. Friend
R. A. Frohreich
H. D. Garrison
M. G. Hayes
M. Manion
W. L. McClain
J. H. McCulley
Garvin Fryar - Conoco

VVV 000017044

Handwritten: 100-1-22-86
Notice letter

May 28, 1986

VISTA

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

Certified Mail
Return Receipt Requested

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

Certified Mail
Return Receipt Requested

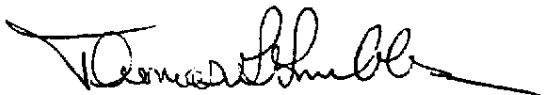
RE: U.S. v. Conoco (Case #83-1916-E)

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 May 27, 1986, the Vista Oklahoma City PVC plant experienced a superfund reportable release which resulted in VC emissions. A transcript of the report to the National Response Center is enclosed. Please contact me if you have any questions regarding this matter.

Sincerely,



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

ajo/9

Enclosure

cc W. L. McClain
H. D. Garrison
R. T. Ferrell

VVV 000017045

TELEPHONE REPORT TO NATIONAL RESPONSE CENTER - MAY 28, 1986

National Response Center Telephone: 800-424-8802
Time of Report: 10:50 a.m., May 28, 1986
National Response Center Attendant: Lt. J.G. Middlebrooks

The attendant asked the following questions:

1. What was the material spilled?

Vinyl Chloride Monomer

2. In what state did the spill occur?

Oklahoma

3. Was this at a fixed facility, on a pipeline, or transport?

At a fixed facility

4. Company represented?

Vista Polymers

5. Street address of facility?

5200 S.E. 59th Street
Oklahoma City, OK 73135

6. Did the spill occur at this location?

Yes

7. Name of person reporting the spill?

John Olson

8. Telephone number?

(405) 672-4551

9. Was Vista responsible for the spill?

Yes

10. At what time did the spill occur?

9:45 p.m. on May 27, 1986

11. Were any bodies of water affected by the spill?

No

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TELEPHONE CONVERSATION

May 28, 1986

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12. Was this a spill to the ground or atmosphere?

To the atmosphere

13. What was the source of the spill?

A 3/4" bleed valve

14. What was the cause of the spill?

A mixture of water and VCM was introduced into a pipe with an open bleed valve.

15. What corrective actions were taken to stop the spill?

The spill was recognized immediately and a valve was closed to isolate the pipe within 5 seconds of the start of the spill.

16. What quantity of VCM was spilled?

Estimated to be 5 pounds

17. Were there any injuries?

No

18. Was there any evacuation?

No

19. Have you notified or do you plan to notify any other agencies outside of your company of the spill?

No

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To _____

From _____

Calculation Sheet

VISTA

1. SPILL SIZE ESTIMATE (SPILL OCCURRED 5/27/86 @ APPROX. 9:45 PM)

- 1) ASSUME THE PRESSURE IN THE V-18 HEADER WAS 90 PSIG AND STATIC. (THIS SHOULD OVERESTIMATE THE SIZE OF THE SPILL DUE TO NOT CONSIDERING PRESSURE DROP IN THE V-18 HEADER, OR LEAVING THE REACTOR, ETC.)
- 2) ASSUME THE BLEEDER WAS WIDE OPEN, 3/4" GATE VALVE HAS 9/16" ORIFICE WHEN FULLY OPEN. (THIS WILL OVERESTIMATE THE SIZE OF THE SPILL IF THE VALVE WAS NOT WIDE OPEN)
- 3) ESTIMATE THE CONCENTRATION OF VCM IN THE SLURRY AS FOLLOWS:
 - a) PVC = (48,500 lb VCM)(84.5% HISTORICAL CONVERSION) = 41,000 lbs.
 - b) VCM = (48,500 lb)(15.5%) = 7,500 lbs
 - c) WATER = 58,500 LBS
 - d) COLLOID = 1465 LBS
 - e) FLUSH WATER = (75 + 30 GPH)(5 HR)(8.34 lb/gal) = 4380 LBS
 - f) CATALYST WATER = (80 + 40 gal)(8.34 lb/gal) = 1000 LBS
 - g) REACTOR VOLUME = 2413 ft³
 - h) REACTOR VAPOR VOLUME = 616.5 ft³ + 203.2 ft³ = 820 ft³
(FROM PED ROL STUDY, JAN. 1986. 616.5 ft³ = NORMAL VAPOR VOLUME AFTER STRIPPING. 203.2 ft³ = VOLUME OF CONDENSATE ADDED DURING STRIPPING)
 - i) DENSITY OF VCM = $\frac{ZRT}{P} = \frac{(0.90)(10.73)(460+135)}{(90+14.7)(62.5 \text{ lb/lb mol})} = 0.875 \text{ lb/ft}^3$
 - j) VCM IN VAPOR SPACE = (0.875 lb/ft³)(820 ft³) = 718 lb
 - k) CONC. OF VCM IN SLURRY = $\frac{7500 - 718}{48,500 + 58,500 + 1465 + 4380 + 1000} = 5.96\%$
 - l) SLURRY DENSITY = $\frac{48,500 + 58,500 + 1465 + 4380 + 1000 - 718}{2413 - 820} = 71.01 \text{ lb/ft}^3$

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Made By SHCDate 5/28/86

Page _____ of _____

Job No. _____

Title _____

To _____

From _____

Calculation Sheet

VISTA

4. FLOW CALCULATION (USING EQN. 3-19 ON PAGE 3-4 OF CRANE HANDBOOK)

$$Q = 236 d^2 \sqrt{\frac{\Delta P}{K \rho}}$$

WHERE : Q = FLOW, gpm

d = DIAMETER, INCHES

 ΔP = PRESSURE DROP, PSI (10)

K = RESISTANCE COEFF.

 ρ = DENSITY, lb/ft³

THE RESISTANCE COEFFICIENT K EQUALS :

$$K_1 \text{ (3/4" PIPE NIPPLE)} = f \frac{L}{D} = \frac{(0.025)(4)}{(0.742)} = 0.13 \quad (\text{FROM PG. 3-4})$$

$$K_2 \text{ (3/4" GATE VALVE)} = \frac{K_1 + 0.5 \sqrt{\sin \frac{\theta}{2}} (1-\beta^2) + (1-\beta^2)^2}{\beta^5} = 1.61 \quad (\text{FROM PG. A-27})$$

$$K_3 \text{ (EXIT)} = 1.0 \quad (\text{FROM PG. A-29})$$

$$K_4 \text{ (ENTRANCE)} = 0.5 \quad (\text{FROM PG. A-29})$$

$$K_{\text{TOTAL}} = 0.13 + 1.61 + 1.0 + 0.5 = 3.24$$

$$\text{FLOW} = Q = 236 d^2 \sqrt{\frac{\Delta P}{K \rho}}$$

$$Q = (236)(0.742)^2 \sqrt{\frac{90}{(3.24)(71.01)}} = 81.27 \text{ gpm}$$

$$Q = (81.27 \text{ gpm})(71.01 \text{ lb/ft}^3) \left(\frac{\text{ft}^3}{7.48 \text{ gal}} \right) = 771.4 \text{ lb/min} \\ = 12.86 \text{ lb/sec}$$

THE ESTIMATED DURATION OF THE SILL WAS 5 SECONDS.

$$\text{ESTIMATED VCM RELEASED} = (12.86 \text{ lb/sec})(5.9670)(5 \text{ sec}) \\ = 3.8 \text{ lbs VCM}$$

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Made By SHCDate 5/28/86

Page _____ of _____

Job No. _____

Title _____

VISTA

May 27, 1986

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

Dear Jack:

As we have discussed, Vista is requesting that one payment be made for the Oklahoma City Plant compliance plan project. This would save administrative time and effort for both companies by not having to invoice and process four small monthly progress payments.

We request full payment of the project costs be made two months after approval of the submitted AFE.

Please let me know if the above is acceptable.

Sincerely,

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

ajo/9

cc Harry Garrison
Bill McClain

VVV 000017050