

TO: Phil Foote

FROM: T. G. Grumbles

DATE: September 17, 1986

Interoffice
Communication

SUBJ: PLANT VISIT: OSHA COMPLIANCE

VISTA

The following will summarize our discussions and the necessary actions to develop OSHA compliance plans and conform with Vista procedures.

Material Safety Data Sheets - We will proceed to develop a MSDS form and write MSDS's for Premiere products. At this time one general compound MSDS, similar to Aberdeen's, should suffice. I will send a draft sheet to you for review to assure the generic additive package statements are correct. Costs for form development and printing should be less than \$500. Distribution of MSDS's and record keeping will be done from Houston through the COEDS developed program.

The plant will need programs for compliance with OSHA Lead, Noise, Hazard Communication, and Respiratory Protection Standards. These are briefly discussed below.

1. Noise Standard - The OSHA Noise Standard requires a hearing conservation program where noise exposures exceed 85 decibels (dBa) and engineering controls in addition to hearing conservation when exposures exceed 90 dBa. Noise measurements will be necessary to determine the actual employee exposures. Additional program elements required will be determined after we obtain these measurements.

Action Steps

- A. Based on sound level measurements taken during the plant visit, you should emphasize the need for the use of personal hearing protection until a survey can be made and a full noise program developed.
 - B. The survey should be done as soon as possible after you are running at "typical" rates.
 - C. We will proceed to develop an education program on noise.
2. Lead Standard - The Lead Standard sets a permissible exposure limit and an action level limit for lead exposure. Similar to the Noise Standard, a survey must be done to determine employee exposures. Additional steps necessary for compliance will be determined by the results of the survey.

Action Steps

- A. Do the necessary air sampling as soon as possible after you are running at typical rates.

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Additional items will be necessary for general OSHA compliance in the area of accident record keeping, bulletin board postings, etc. I will contact one of our safety directors to help you in this area.

A quantitative assessment of the ventilation systems in the compounding areas should be done. This can be accomplished at the time of the noise and lead surveys.

As we discussed, there is a lot to do initially to assure compliance and establish plant safety and health programs. However, based on the size of the plant and anticipated work force size, I believe we can help do much of the initial survey and administrative work. Ongoing requirements will be determined by the initial surveys.

I will be in contact soon to discuss timing on the action items. Please call if you have questions on the above, or the attachments.



Thomas G. Grumbles

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Attachments

cc R. E. Lehmkuhl
W. L. McClain

VVV 000015466

TO: JAL: MIMO: RF
RE: Notice Letters

September 17, 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

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 September 15, 1986, the Vista VCM plant experienced a release which resulted in VC emissions. The release resulted from a small leak in a VCM feed line to the vinyl column, and is estimated to be less than 150 lbs. It was reported to Superfund and LDEQ. Please contact me if you have any questions regarding this matter.

Sincerely,


Thomas G. Grumbles, C.I.H.

Environmental Quality Manager

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

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