

May 4, 1987

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Mr. Steve Wurtz
Environmental Protection Agency
Region VII
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Kansas City, KS 66101

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Superfund

Dear Mr. Wurtz:

Mobay Corporation (Mobay) appreciates the opportunity to comment upon the proposed remedial options for the Conservation Chemical Company Kansas City site. These comments respond to the letter, dated March 26, 1987, from your offices addressed to interested citizens, and inviting public comment on the proposed response alternatives for remediation of the CCC site.

Mobay has studied the documents describing the remedial alternatives which have been made available for public review. In addition, representatives of our company attended the public meeting held at the Manchester Elementary School, 6839 Truman Road, Kansas City, Missouri on April 23, 1987.

Mobay Corporation owns and occupies property adjacent to the CCC site, on which property its Agricultural Chemicals Division operates an extensive and complex manufacturing facility. Mobay personnel physically present daily at this facility number in excess of 1,000. Additionally, at any given time, outside contractors, and other non-Mobay independent third parties are present on the Mobay facilities for a variety of reasons.

Our review of the public documents addressing the remedial alternatives for CCC reflects that little, if any, discussion is contained in these documents relative to the protection of adjoining property owners, particularly pertaining to the health and safety of personnel in close proximity to the CCC site, to be afforded during the implementation of a remedy.

Mobay, of course, is very sensitive to, and has a genuine interest in any developments in close proximity to its facilities which may have an effect upon the health, safety and well being of its personnel. We believe that EPA, irrespective of the particular remedial option that may be implemented, would have equal concern for the personnel of adjoining landowners, notwithstanding

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that the public documents outlining the proposed options might not acknowledge and address the impact upon adjoining properties.

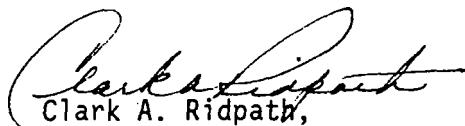
As is commonly known, the CCC site is not an isolated site, but, in fact, is adjoined by two property owners, one of which is Mobay. The purpose of these comments then is to respectfully request the EPA, during its process of selecting a specific remedy, and, importantly, in its ultimate implementation, to consider the health and safety of all personnel situated in facilities adjoining the CCC site, and to incorporate within the remedial plan appropriate rules and measures to insure no risk will be suffered by Mobay, its physical facilities and employees.

Accordingly, Mobay stands ready to cooperate with the EPA to provide necessary information and adequate consultation to the end that the safety of its property and employees is insured.

Again we thank you for the opportunity to submit these comments, and ask that you afford them serious consideration.

Sincerely,

MOBAY CORPORATION
AGRICULTURAL CHEMICALS DIVISION


Clark A. Ridpath,
Manager, Legal Services

CAR/smm