No. <u>85-01</u>

Date: <u>July 16, 1985</u>

Review Procedure Releases

The Department of Justice has received a review request from the Atlantic Richfield Company ("ARCO") pursuant to the Review Procedure Releases Procedure, 28 C.F.R. 50.18.

ARCO, doing business through its wholly-owned subsidiary, ARCO Chemical Europe, Inc. ("ACEI"), has announced plans for the construction of a chemical plant to be located in Fos-sur-mer, Bouches du Rhone, France. The proposed plant will produce large quantities of propylene oxide and gasoline-grade tertiary butyl alcohol.

ARCO intends to invite officials of the French Government Ministry responsible for that Nation's industrial finance and development programs and for the issuance of permits and licenses necessary for the Fos-sur-mer project. The French government will designate an official or officials to meet with ARCO Chemical Company management personnel in Philadelphia and to inspect an ARCO chemical plan at Bayport, Texas, similar to the plant proposed for Fos-sur-mer. The meetings and plant inspection are to address environmental and management concerns raised by French authorities in connection with the operation of a large scale chemical plant.

ARCO has furnished an opinion that the proposed conduct does not violate French law. The travel will occur during a period of not more than one week and ARCO will pay the necessary and reasonable expenses of the French delegation, which will include those for air travel, lodging and meals.

Based on all the facts and circumstances, as represented by the requestor, the Department does not presently intend to take an enforcement action with respect to any of the prospective conduct described in this request.

The FCPA Review letter and this release have no application to any party not joining in the request, and may be relied upon by the requesting party only to the extent that the disclosure of facts and circumstance[s] in the request is accurate and complete and continues to accurately and completely reflect the actual facts and circumstances.