



Interoffice Communication

To J. C. Ledvina - Houston Chemicals
From J. A. DeBernardi
Date May 6, 1982
Subject NEIC Laboratory Deficiency Issue

In response to your note of April 30 on the subject I would suggest we drop the situation right where it is.

It is my opinion that both Conoco and EPA overreacted to the situation. I think this was made clear when we finally got the NEIC Inspection report (attached) and found that a difference was made by NEIC between required changes and recommended changes.

The VCM Plant has already complied with the required changes and the majority of recommended changes. To continue a dialogue to prove who's right or wrong, essentially serves no purpose on such a trivial matter as this. The more contact we have either written or face to face on this matter only tends to alienate our EPA relationship. As I see it, alienation over this matter, at least at the VCM Plant, is not worth the effort.

Please understand, I am not suggesting that we adopt all standard practices listed in the volumes of EPA published procedures and practices related to our laboratory. What I mean is, when an inspection uncovers a deficiency and a report requires a change we look to complying with the requirement set forth and that's all. I continue to believe that to justify their existence an inspection team must find something wrong, and will find something wrong no matter how much money or effort is put forth to reach perfection.

As you know our plant takes a top priority interest in protecting the environment and being good neighbors in the community. The fact that the letter of the law is not met in every conceivable situation does not detract from the fact that the intent of the law is never lost sight of. The practicality of any situation normally leads to the proper path being followed.

J. A. DeBernardi

br
attachment
cc w/attachment
RDG-JWW-RB-DLD - #2yes
6/28/82

CCR 000067257

~~At Outfall 001 (the combined effluent), temperature and pH are continuously monitored by the plant. The NEIC determined methods and records to be adequate.~~

Analytical Laboratory

NEIC found sample containers, preservation techniques, and holding times to be acceptable. Recordkeeping was satisfactory and met the requirements of the permit. No problems were seen in the laboratory portion of the inspection that should significantly impact the quality of NPDES results. A number of minor deviations from required laboratory practices were noted as follows:

Required Changes

- Three 20 ml portions of DI or distilled water must be used to prewash TSS filters.
- TSS filters must be reweighed until constant weight is achieved.
- The depletion rule for the BOD test, i.e., 2 mg/l D.O. with 1 mg/l remaining must be observed where possible.

*Need
to do
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Recommended Changes

- Glucose/glutamic acid standard should be used monthly to validate BOD test.
- Reverse osmosis water to make dilution water should be periodically checked for TOC and metals.
- Chromic acid should not be used to clean BOD bottles.
- Analytical balance for TSS measurements should be calibrated daily and a log kept.
- Thermometers for TSS oven and BOD incubator should be calibrated and calibration records kept.
- Log of TSS oven temperature should be kept.
- Daily log of temperature of BOD incubator should be kept.

*These
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given*

- Lab QC procedures should include use of spike samples on 10% frequency for chlorinated HC, COD, and $\text{NH}_3\text{-N}$.
- Outside reference samples should be periodically analyzed as an independent check on the VCM laboratory.
- QA statement should be developed defining acceptable tolerances and identifying corrective action necessary when these tolerances are exceeded.

SELF-MONITORING RECORDS AND NPDES VIOLATIONS, 1979-1980

In the first half of 1979, Conoco VCM experienced a large number of NPDES violations. Most were high TSS levels in the incinerator effluent (Outfall 101). In May 1979, the incineration stream was taken out of the VCM treatment works and diverted to the adjoining Lake Charles Chemical Plant. The NEIC team examined the self-monitoring records from July 1979 to December 1980 to determine performance of the VCM biological treatment works and assess discharges following the changes. Starting in July 1979, the number of violations decreased dramatically and outfall waste loads were considerably below permitted levels. However, the frequency of raw waste bypasses around the treatment works continues to be a problem. Increased waste equalization capacity or emergency offline storage is necessary to correct the bypass situation.

Monthly average loads for the treatment plant effluent (Outfall 201) were compared to average 30 day permit limits for the 18 month period of July 1979 to December 1980. On an average monthly basis, the treatment plant is achieving results far better than the NPDES limits.

Parameter	Range of Monthly Values (lb/day)	Permit Limit (lb/day)
BOD ₅	3-595	600
COD	434-2,460	4,177
TSS	54-278	558
NH ₄ as N	1-25	30
Chlorinated HC	106-915	1,500
Flow (mgd)	0.49-0.81	-