Conoco

3311
KERDEE

Interoffice Communication

To Curry Miller

From J. C. Ledvina

Date January 6, 1980

Subject ABERDEEN ENVIRONMENTAL AUDIT

On December 16-17, 1980 the Aberdeen Plant was audited for environmental compliance. The team consisted of Mary Ann Chance, Ponca City, Paul Warner, OKC, Veldon Messick, Aberdeen, and me. Compliance with specific regulations was reviewed and our findings are documented below.

RCRA

In general the regulation was complied with, but we offer these suggestions:

1. Waste Analysis Plan -- Should be broadened to touch on specifics in the regulations; for example, timing of analysis, what will be analyzed, method.

2. Manifest System -- The Chemical Waste Management manifest intended for use at Aberdeen meets RCRA requirements. Importance of the manifest system should be conveyed to Plant people.

3. Operating Record -- Add inspection information to daily operator logs.

4. Contingency Plan -- Needs to be added to the SPCC Plan. Describe arrangements with local officials. Include paragraph on fire fighting equipment.

5. Inspections -- Write up what to inspect, when, how to report.

6. Security -- Looks good.

7. Required Equipment -- Write paragraph describing plant communications system and include testing of the system.

8. Insurance -- Check with Jim Begley, Ponca City for confirmation of sudden liability insurance coverage. Get a letter from Begley and keep in the file.

9. Groundwater Monitoring -- The program needs to be accelerated to meet the 11/19/81 deadline.

10. Annual Report -- Need to complete the annual report by 3/1/81.

11. Requirements for 5/19/81:
    a. Personnel Training
    b. Closure Plan
    c. Cost Estimate for Closure

SPCC PLAN

Was updated 1/30/80 and certified by registered professional engineer. Plan looks acceptable.

SECTION 311 OF CLEAN WATER ACT - HAZARDOUS SUBSTANCE SPILLS

We recommend that JCL's letter of 9/12/79 on this subject be recirculated to plant supervisors as a reminder.

PCBs

1. Stickers are on transformers although a detailed cross-check was not made. Some transformer stickers are hidden and should be stickered more visibly.

2. The annual report is excellent.

3. The PCB storage area should be placarded.

4. We recommend a vulnerability survey to identify areas where use of PCBs is a poor risk such as near drainage ditches, sewer drains, or ponds.

NESHAPS - ASBESTOS

Finalize the proposed procedure. Include paragraph on disposal.

TOSCA 8(e) - SUBSTANTIAL RISK

New employees were recently trained on 8(e); a mechanism is now set up to include 8(e) training in employee orientation program. Previously trained employees have not been retrained. We suggest this be done. Record keeping is good.

NESHAP's - VCM

Compliance with the VCM Standard was reviewed in detail. Recordkeeping is very good. In general the standard is either being complied with or corrective action is well under way to assure 100% compliance.

WASTEWATER

Analysis in excess of those required are being done for internal control purposes. The Consolidated Permit Regulations require that these be reported on the Discharge Monitoring Reports (DMRs). We suggest you discuss this with the State and see what they prefer.

Overall, the Plant has a sound environmental program, but the drain on resources, both financially and manpower is very high.

Joseph C. Ledvina

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cc R. E. Lehmkuhl
V. Messick
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P. Warner