



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

DEC 4 1980

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Mr. R. B. Gamblin
Manager
Conoco Chemicals Division
P. O. 37
Lake Charles, Louisiana 70669

Dear Mr. Gamblin:

The Environmental Protection Agency, National Enforcement Investigations Center (NEIC) will conduct an inspection of your facility in the fall of 1980.

The inspection team will be under the direction of Mr. E. J. Struzeski or Mr. A. E. Franzen, who will confirm the details of the inspections with you. The purpose of the inspection is (1) to assess the impact of wastewater discharges, air emissions and solid and liquid waste disposal practices on the surrounding environment and (2) to evaluate current compliance status with the applicable statutes, regulations and with permits issued to your facility. The inspectors will observe process operations; evaluate monitoring practices, equipment and sites; examine waste management practices; review related records; and collect environmental samples which may include air, water, waste and/or soil samples. In addition, the inspectors may wish to take photographs of selected subjects. They will be interested in any phase of your operation which could lead to pollution. Accordingly, facility personnel should follow their usual practices and procedures for production and monitoring. Prior to their arrival, the inspection team will require certain information. Accordingly, we ask that the following materials be submitted to NEIC. Even though certain documents may have been previously submitted to the EPA Effluent Guidelines Division or to other EPA programs, the NEIC inspection team will require a copy of the same data to expedite the survey and to ensure that the NEIC analysis is both factual and comprehensive.

The inspection authority, as well as the authority for obtaining requested information, is contained in one or more of the following statutes:

Section 114 of the Clean Air Act (42 USC 1957)

Section 308 of the Federal Water Pollution Control Act (3 USC 1318)

DTH 000024274

Sections 8 and 9 of the Federal Insecticide, Fungicide and Rodenticide Act (7 USC 136)

Section 3007 of the Resources Conservation and Recovery Act (42 USC 6927)

Section 1445 of the Safe Drinking Water Act (42 USC 300)

Section 11 of the Toxic Substances Control Act (15 USC 2610)

Please provide copies of the following data, plans, specifications, information requested, etc., for EPA's retention within 30 days of receipt of this letter.

1. A plot of the plant property indicating the locations of all outfalls, process areas, wastewater treatment facilities, air pollution control equipment and emission points, spring water and groundwater supplies, drinking water supply wells and treatment facilities, surface water diversions or channeling of runoff to the receiving waters, and solid and liquid waste treatment, storage, or disposal sites, including injection wells.
2. A comprehensive list of raw materials, intermediates, products and byproducts giving the average daily quantities of each representative of the past year's operations. Exclude laboratory and experimental items.
3. Unit process flow diagrams showing where all wastewaters, air emissions and solid and liquid wastes originate, the approximate flow from each effluent or emission point source and the composition of each flow or waste material. Include all the information needed to determine the allowable discharge rates as prescribed in the applicable Effluent Limitation Guideline regulations.
4. A description of the wastewater system from the point sources to the outfall. Include procedures for handling stormwater runoff, ballast waters, etc. Provide design details of the wastewater treating facilities with typical and maximum rate performance data and describe each flow measurement device and sampling system. Include a description of major operative or maintenance problems that have caused permit violations. List all permit violations for past three years and describe the contributing causes. Also describe any items that are not in compliance with NPDES permit. Is a compliance schedule involved? Give details.
5. List all facilities that are controlled or influenced by State and/or Federal air quality regulations. Describe air pollution emission points and related air pollution control equipment.

Provide design and normal operating parameters; include the most recent data needed to determine compliance with the pertinent regulations in addition to data required to calculate effective stack heights for affected stacks. If the State issues operating permits, be prepared to show them. List all violations of air regulations for the past three years and describe the contributing causes. Include the latest emissions inventory report.

6. List all liquid and solid wastes; include information on approximate quantities, methods of handling and the ultimate disposal destination. Describe the on-site waste disposal facilities including sludge farms and injection wells. Give permit details including limitations. Describe testing procedures used to measure infiltration and migration. Include identification of any priority pollutants* disposed of in the past three years and their probable location. Is a State permit required? If so, give the details of the information supplied to the State and the permit or registration number.
7. A description of any blowdown systems, including the disposition of the off-gases. For each flow include type, height and diameter of stack (ft), rated capacity (106 BTU/hr and tons/hr) of flared material, amount of material flared, percent of time flare is used, where flared material originates (i.e. include a block diagram to show all units that could send material to the flare), type of flare ignition device at top of stack and sulfur content of flared material (% by weight).
8. A listing of all hydrocarbon storage tanks greater than 1,000 gallon capacity including crude oil and fuel oil tanks. Provide for each tank the tank number, tank capacity, type of tank (fixed floating roof, pressure), material stored, molecular weight of material stored (average molecular weight for mixtures), average daily throughput, true vapor pressure at maximum storage temperature (psia at °F), control pressure, type of vapor loss control and average efficiency.
9. A list and description of the devices or methods used for monitoring water and air pollution control equipment, including, but not limited to manufacturers and model numbers of the sensing device transmitters and recorders; parameters measured, calibration procedures, integrator or chart factors, etc. indicate normal operating data for these devices.

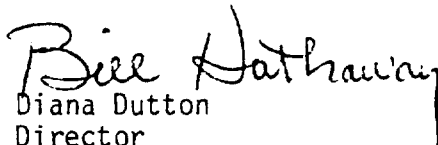
* NRDC v Train, 6ELR 20588; 8ERC 2120; Table 1 of Committee Print 95-30; Federal Register, January 31, 1978, (43 FR 4108).

10. Copies of all air pollution source tests conducted by or for the Company over the past three years.
11. The Company definition of its production day (e.g. 8 am to 8 am, midnight to midnight).
12. A copy of your Spill Prevention, Control and Countermeasure Plan.

Pursuant to regulations appearing at 40 C.F.R., Part 2, Subpart B (41 Fed. Reg. 36906, September 1, 1976), you are entitled to assert a business confidentiality claim covering any part of the submitted information which is not emissions data, effluent data, or contaminants in drinking water, as defined in 40 C.F.R. §§2.301(a)(2), 2.302(a)(2) (i), and 2.304(a)(2), respectively. Unless such a confidentiality claim is asserted at the time requested information is submitted, EPA may make this information available to the public without further notice to you. Information subject to a business confidentiality claim may be made available to the public only to the extent set forth in the above-cited regulations. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. 2.203(b).

If you have any questions please call Mr. E. J. Struzeski at (303) 234-4708 or Mr. A. E. Franzen at (303) 234-4658₁.

Sincerely,


Diana Dutton
Director
Enforcement Division (6AE)

1 Mailing Address:

Environmental Protection Agency
National Enforcement Investigations Center
Denver Federal Center
Box 25227, Building 53
Denver, Colorado 80225

cc: Mr. Dale Givens
Louisiana Department of Natural Resources

Mr. William Blackman
EPA - NEIC - Denver