

WE WILL
DISCUSS THIS
MONDAY
3/16/81

Interoffice Communication

To Plant Managers
From J. C. Ledvina
Date February 27, 1981
Subject SUPERFUND REPORTING

Reptial quality 1 # VCM

Each Plant should have received a letter recently from Mary Ann Chance regarding reporting requirements under the Hazardous Waste Containment Act of 1980, also known as Superfund. A copy of the letter is attached. My letter is to advise you to begin reporting releases and to provide guidance on the type of release to report.

Literally read, Superfund requires reporting of almost any release to the air, land, or water in quantities above one pound. I don't believe this was Congress' intent. EPA is being inundated with reports of minor releases and is planning to provide more specific guidance on what should be reported. Attachment 2 is an article from "Inside EPA" outlining EPA intentions.

Conoco Chemicals' position is now to report significant releases of hazardous materials. Specifically, reports should be made in the following situations:

1. A spill which occurs or flows outside Plant boundaries.
2. Spills to the wastewater treatment system that cause permit violations.
3. Vinyl Chloride releases to the air reportable under NESHAP's.
4. Non-routine releases to the air.
5. Leaking of hazardous materials from pits and lagoons.

Releases of these types should be reported to the National Response Center as soon as a responsible person becomes aware of them; call 1-800-424-8802. I interpret responsible person to mean someone involved in management of the Plant such as Plant Manager, Operations Superintendent, Chief Process Engineer, etc.

A second reporting requirement is to notify EPA by June 9, 1981 of abandoned waste disposal sites. Refer to Mary Ann's letter. I'd like to review and discuss your lists well before 6/9/81. Please develop and send it to me by April 15. This should give us time to review before officially reporting.

Give me a call if you'd like to discuss either of the reporting requirements.


J. C. Ledvina

DTH 000071786

cc REL, JJD, DAK

Attachments