



Lake Charles VCM Plant

Conoco Chemicals Company  
A Division of Conoco Inc.  
P.O. Box 605  
Westlake, Louisiana 70669  
(318) 491-5211

September 22, 1980

Mr. S. L. Bergh, Chemical Engineer  
Enviro Control, Inc.  
One Central Plaza  
11300 Rockville Pike  
Rockville, MD 20852

Dear Mr. Bergh:

The following is in response to your letter of September 8, 1980 related to information on 1,1-Dichloroethane for the Interagency Testing Committee.

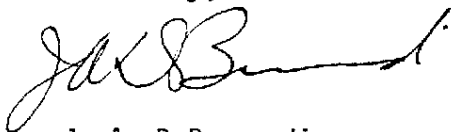
1. I am unable to supply you with information related to total U. S. production of 1,1 DCE. The material is produced as a by-product in our process for the production of 1,2 DCE (Ethylene Dichloride).
2. I am unable to forecast production trends of 1,1 DCE. For those industries producing it as a by-product, the normal trend is to reduce by-product production by process revisions.
3. 1,2 DCE (Ethylene Dichloride) is used in our process to produce Vinyl Chloride Monomer.
4. Our process is a continuous type with all vents controlled to meet existing EPA, State, and local air and water pollution standards. Control methods include thermal incineration and catalytic reaction. The by-product, 1,1 DCE leaves our plant contained in a light-ends stream which is sold to a Carbon-Tetrachloride processing plant for use as a raw material in that process. I do not have knowledge as to what wastes are produced or handling methods used in the Carbon-Tetrachloride processing facility.
5. I am unable to supply factual information related to environmental affects, biodegradability, or chemical reactions expected if 1,1 DCE is released to the environment.
6. In our process the by-product stream containing 1,1 DCE also contains Ethylene Dichloride, Ethyl Chloride, and Carbon Tetrachloride.
7. No health affect studies related to 1,1 DCE have been conducted by Conoco Chemicals Company.

CCR 000079941

Mr. S. L. Bergh  
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We do not have technical bulletins or safety data sheets for 1,1 DCE. However, information on this material can be found in Industrial Hygiene and Toxicology, Volume II, Frank A. Patty, Editor, Page 1279-1280. Additional information is also available in Dangerous Properties of Industrial Materials, Fifth Edition, N. Irving Sax, Page 666-667.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. A. DeBernardi', with a stylized, cursive script.

J. A. DeBernardi

is  
CC:  
RDG-JJH

CCR 000079942



September 8, 1980

Mr. Jim DeBernardi  
Conoco, Inc.  
Box 605  
West Lake, LA 70669

Re: Information on 1,1-Dichloroethane  
(chemical abstract service registration  
number 75-34-3) for the Interagency  
Testing Committee (ITC).

Dear Mr. DeBernardi:

During our conversation on September 8, 1980, I indicated  
that the ITC was interested in the following information  
on 1,1-dichloroethane:

1. Total U.S. production of the chemical by all  
companies - this would include any produced as  
a byproduct.
2. Forecast production trends - if the annual  
production is 100,000 lbs. or less, the ITC  
is not interested in additional information  
unless the trend shows that production will  
exceed that figure in the near future.
3. Key uses, by % - since you produce the che-  
mical as a byproduct what are the uses of  
the main product?
4. Estimated release to environment at the plant  
site. If possible indicate if process is  
batch or enclosed when and where chemical is  
released and how any wastes associated with  
the chemical are processed.
5. If released would the chemical accumulate in  
the environment at the plant site? Is it  
biodegradable? What reactions might the che-  
mical undergo if released to the environment?

*Produced in qty  
5-309, 306, 307*

*No info. on US prod  
approx. 200,000 lbs./day  
produced as by product*

*No info.*

*EDC used in our plant  
to produce VCM.*

*Material leave  
system with L.E. atom.  
for further processing  
in Per-Tet Plant*

*No data available  
plt. vents controlled  
per EPA rules*

*No info.*

CCR 000079944

Letter to Mr. J. DeBernardi  
Conoco, Inc.  
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6. Are any other substances present with the chemical which might be more harmful than the chemical itself?

*other by-products  
are stream have  
established TLV's  
such as CCl<sub>4</sub>, E<sub>2</sub>, B<sub>2</sub>  
12 DEC  
No data*

7. Health effects - any work your company may have done on this chemical would be helpful.

*Check with the*

I would also like any available technical bulletins and material safety data sheets on 1,1-dichloroethane that you have.

The above information is to be submitted to the ITC by September 26, 1980. It is being compiled under contract No. 68-01-5789 with the ITC. As I mentioned the ITC functions under the authority of the Toxic Substances Control Act (TSCA). If you have any questions please call me at (301) 468-2500.

Sincerely,

ENVIRO CONTROL, INC.

*Steven L. Bergh*  
Steven L. Bergh  
Chemical Engineer

SLB/al

CCR 000079945



Lake Charles VCM Plant

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P.O. Box 605  
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CERTIFIED MAIL #315671  
RETURN RECEIPT REQUESTED

September 19, 1980

Mr. E. J. Struzeski and Mr. A. E. Franzen  
Environmental Protection Agency  
National Enforcement Investigations Center  
Denver Federal Center  
Box 25227, Building 53  
Denver, Colorado 80225

Dear Mr. Struzeski and Mr. Franzen,

Conoco Chemicals Company's VCM Plant in Westlake, Louisiana is submitting as requested the attached information pertaining to the EPA inspection of this facility in the fall of 1980.

In best interests of both parties please give notice to the VCM Plant's turnaround, which is scheduled for the month of October, when scheduling your inspection of the plant for the fall of 1980. The plant will be shutdown for scheduled maintenance during the turnaround and will not be operating until late October.

Items marked "CONFIDENTIAL" are to be treated as such pursuant to regulations appearing at 40 C.F.R. Part 2, subpart B (41 Fed. Reg. 36906, September 1, 1976).

Please direct any further questions concerning this inspection to Gary Foshee, Chief Process Engineer, who can be reached at (318) 491-5062.

Sincerely yours,

  
J. A. DeBernardi  
Plant Manager

ks

cc: Letter only - Diana Dutton, Director - EPA  
Dale Givens, Louisiana Department of Natural Resources

bcc: Letter only - REL, CRH, HJN, RLH, PLF, DLD, JWW, CWT  
Letter and manual - GLF, JCL, VAM

CCR 000079946