

Joseph C. Ledvina

CONOCO

To J. DeBernardi.

Date 4/30/82

See item 2 of attached. Legal
plans to do nothing new on the
NEIC - Laboratory deficiency issue.
They recommend either doing it EPA's
way or meeting with EPA to
convince them our way is O.K.
Legal will help us if we choose to
go to EPA.

What do you want to do.

Joe.



Interoffice Communication

To J. C. Ledvina - Houston

From S. W. Sommer

Date April 13, 1982

Subject LC VCM Plant Environmental Audit - First Quarter Update

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APR 14 1982
BRADLEY I. RAFFLE

The following actions have been taken on the recommendations made during the environmental audit of the Lake Charles VCM Plant in December, 1981:

- 1) An acceptable asbestos handling and disposal procedure for the VCM Plant was issued and implemented in March. Maintenance and Operations personnel will receive instruction in the new procedures, and the procedure has been made a permanent part of the VCM Plant Environmental Information Manual.
- 2) The Performance Evaluation report resulting from the January 1981 inspection by the EPA National Enforcement Investigations Center (NEIC) was received in March. The report included required and recommended changes in current NPDES laboratory procedures. All required changes have been made, and most of the recommended changes have also been implemented. The Legal Department is expected to comment soon on the discrepancies between the list of required laboratory procedure changes mandated by the NEIC and those mandated by the EPA Region VI Compliance Section.
- 3) The current projected completion date for the Secondary Flood Prevention Revisions is August, 1982. No updates to the Hazardous Waste Permit are expected before August 1982, so no notification to the State of Louisiana is needed at this time concerning the revised completion date.
- 4) The original, certified SPCC Plan has been securely filed by Process Engineering for reference.
- 5) The procedure for voiding manifests when hazardous waste is returned by the disposer has been implemented.

The progress at the VCM Plant on these items will continue to be updated quarterly and forwarded to you. Items 3, 4 and 5 have been completed, and these items will not appear in future updates unless there has been a change in their status. If you have any questions or comments, please contact me at ETN-640-5058.

Handwritten: Brad, do you agree with this?
Additional determination coming out of legal.

Signature: Scott W. Sommer

Scott W. Sommer
Process Engineer

CCR 000067261

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cc: RDG-JAD-JWW-CAG-MGH-RB-PLF-DLD-MJM