



Interoffice Communication

To R. E. Lehmkuhl
From J. J. Hall
Date March 1, 1983
Subject MONTHLY ACTIVITY REPORT - ENVIRONMENTAL DEPARTMENT

LAKE CHARLES WASTE DISPOSAL

You are up to date on this issue. I will continue to keep you informed.

NATIONAL WASTE DISPOSAL CONTRACTS

National waste disposal contracts have been negotiated with seven waste disposal firms. The plants now have the option to utilize these contracts which can save time, reduce liability, and potentially involve volume discounts.

PRIORITY POLLUTANT PROGRAM

Chemical industry effluent guidelines will be proposed any day. These guidelines will set acceptable discharge levels for traditional pollutants such as Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) as well as for toxic priority pollutants. A program is being formulated to run a series of wastewater analyses at several plants to determine levels of toxics in the wastewater. The program should be implemented during March.

MSDSs

During the month, draft MSDSs were sent out for review and comment on the following products: ALFONIC 1412-70 Novel, ALFONIC 1214-HA 30, LCCP n-Paraffins (7), CN-5 Specialty Alkylate, N550-L, N600-L, LMR-6L, and LMR-55L.

Work is underway to develop a distribution and recordkeeping system for MSDSs. Meetings planned with the Business areas, Marketing, and CSL to determine needs of those groups, and Legal is exploring recordkeeping requirements for product liability concerns.

Revisions were made on MSDSs for CDR, PVC Compound, and Dry-blend.

CCPTAC

Testing results have been received for 1214-HA-30 and Novel ALFONIC 1412-70. The oral LD₅₀ and inhalation LC₅₀ results for the Novel product appeared to be significantly lower than other similar materials. Further oral tests were run to confirm the oral results. Further discussions are planned concerning the significance of the results and notification of Lever Bros., the primary purchaser.

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INDUSTRIAL HYGIENE

In response to the soon to be released corporate Respiratory Protection Procedures, which will contain a beard policy statement, a Conoco Chemicals' Respirator Use/Beard Policy has been drafted and circulated for comment to plant Safety Directors and Managers.

The Chocolate Bayou plant Respiratory Protection Policy was reviewed. Contractor education programs for the LC VCM plant and revised VCM and lead health education programs for Aberdeen were reviewed.

Plant visits were made at Aberdeen and the Lake Charles plant with the Corporate HISS team working on the industrial hygiene module. Draft input forms and report formats were reviewed in terms of plant needs and use. Also, it appears we will be able to input our "old" data into the system via a translator program.

DUPONT CONTACTS

At DuPont's request, our product list was reviewed in relation to a California Right-to-Know" regulation which requires that MSDSs for all products sold in California that appear on their toxic substances list be sent to the State. No Chemicals' products sold in California are on the list.

The Petrochemicals Department has requested chemical inventory lists, to include products and other process chemicals, be sent to them for inclusion in the ISD's corporate inventory list. The lists are being compiled.

REGULATORY

The First Circuit Court of Appeals stay on the First Circuit Court order to OSHA for promulgation of an EO ETS has been extended for an undetermined amount of time. There is no best-guess on how long the court will take to review the case.

SUPERFUND LETTER

A letter was sent from Conoco Legal to EPA outlining the procedures we intend to follow toward compliance with the reporting requirements under "Superfund".

NEWARK ENVIRONMENTAL ASSESSMENT

This project is ready to go but it is on temporary hold until a final decision is made.

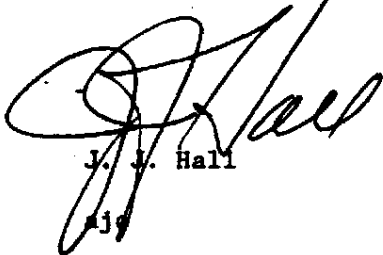
EPA VISIT TO LC VCM

EPA sent a follow-up list of questions to the VCM plant concerning relief valve discharges. Representatives of EPA visited the Plant on February 8, to discuss our answers to this list and questions submitted in the past.

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EPA will make a determination of whether our past VCM releases were or were not preventable and will contact us in June with their conclusions.



J. J. Hall

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