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Interoffice Communication

To J. A. DeBernardi

From J. C. Ledvina

Date January 20, 1982

Subject LC VCM ENVIRONMENTAL AUDIT

The LC VCM environmental compliance audit was done on December 14 and 15. Team members were Peggy Marritt - LC VCM, Mike Hayes - LCCP, Carlos Guerra - Legal, and myself. All phases of the Plant environmental program were audited with the exception of vinyl chloride NESHAP's and wastewater discharge performance. These two areas were subjects of intensive audits by EPA earlier in 1981.

As a result of the audit, the team has the following comments:

1. Asbestos disposal practices should be compared to NESHAP's requirements. JCL will provide a copy of Newark's asbestos program as a guide for developing a LC VCM procedure.
2. Current lab practices should be compared to the revised editions of Standard Methods, ASTM Methods, or EPA Methods. Where deviations are found, a cost analysis should be made to determine the time and money required to comply with the revised methods. Depending on the cost analysis, the laboratory procedures should be changed, and equivalency should be requested from the EPA, or the cost analysis should be reviewed by our Legal Department for recommendations and guidelines.
3. The State of Louisiana was told that a project to exclude floodwater from the LC VCM wastewater treatment system would be completed in January 1982. This date will not be met. Notification to the State should be made when the Hazardous Waste Permit application is updated.
4. The original, certified SPCC Plan should be located and kept in a location accessible to those who may have contact with state or federal inspectors.
5. Manifests which have been voided because the material was returned should be annotated to indicate why. Loads of VCM heavy ends are periodically returned from PPG because the material is off specification. A hand written note on the manifest is suggested to avoid questions from a state or federal inspector.

Your cooperation during the audit is appreciated.

J. C. Ledvina
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