

CONOCO

Lake Charles VCM Plant

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

CERTIFIED MAIL #315674
RETURN RECEIPT REQUESTED

June 20, 1980

RECEIVED

JUN 24 1980

UHA
FYI
File: LCVCM

Ms. Allyn M. Davis
Director - Air & Hazardous Materials Division
United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Davis,

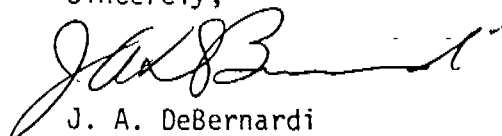
Thank you for your letter of April 23, 1980 informing us of the findings of two other manufacturers of chlorinated hydrocarbons. As a manufacturer of chlorinated hydrocarbons we were concerned over the levels of polychlorinated biphenyls (PCB's) found by these two manufacturers in their waste product streams.

Samples of the waste streams and storage tanks at this plant were taken and subsequently analyzed by our Research and Development's Analytical laboratory located in Ponca City, Oklahoma. Dr. Frank McEnroe conducted the analytical work utilizing a GC/Mass Spectrographic technique. The sensitivity of the analytical method indicates the detectable limit for PCB's including monochlorobiphenyl to be near 0.5 ppm and is based on spiked and unspiked analyses of our waste streams.

The analyses for these samples, per your request, are shown in the attached table. The data definitely indicates the PCB's level in our waste streams to be less than 50 ppm. Thus this plant would not be considered a PCB manufacturer and those regulations as outlined and defined in the Toxic Substance Control Act (TSCA) May 31, 1979 regarding disposal of liquids containing more than 50 ppm PCB's do not apply. It is the intent of management to comply with the regulations dealing with disposal and use of those liquid waste streams containing less than 50 ppm PCB's.

Should you have any questions regarding the analytical data presented please contact Mr. Paul Fetzer, Chief Chemist, Lake Charles VCM Plant (318) 491-5067.

Sincerely,


J. A. DeBernardi

br

BCC:

REL-CRH-HJN-VAM-RLH-GLF-PLF-DLD-JWW-JCL

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CONOCO VCM PLANT
WASTE STREAM
PCB ANALYSIS

<u>Date</u>	<u>Sample</u>	<u>*PPM Total PCB's</u>
5/8/80	Ethylene Dichloride Tars	Not Detected
5/9/80	Ethylene Dichloride Tars	Not Detected
5/8/80	Vinyl Chloride Tars	Not Detected
5/8/80	T-405 Tars Storage Tank	Not Detected
5/8/80	T-452 Tars Storage Tank	Not Detected

*Based on detectable limits - PCB's if present would be so at levels less than 0.5 ppm.

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