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ASSISTANT SECRETARY

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF ENVIRONMENTAL AFFAIRS
HAZARDOUS WASTE MANAGEMENT DIVISION

GERALD D. HEALY, JR.
ADMINISTRATOR

April 12, 1983

ENVIRONMENTAL CONTROL

1183

G. W. Daigre, Environmental Control Manager
Dow Chemical, U.S.A. (GD-234)
Post Office Box 150
Plaquemine, Louisiana 70764

Dear Mr. Daigre:

Re: LETTER OF WARNING

On March 10, 1983, an inspection of your facility was performed to determine the degree of compliance with the Louisiana Hazardous Waste Management Plan.

During the course of the inspection, the following violations were noted:

1. Contrary to Condition S of your Interim Permit as outlined in the Analytical Operating Procedures Manual (AOPM), Part C.47, inspections for freeboard requirements in the Light Hydrocarbons Impoundment could not be confirmed.
2. Contrary to Section 8.4.2 D.2) of the Hazardous Waste Management Plan, the containment area for trucks discharging to the Central Waste Incinerator's waste storage tanks did not appear adequate to contain a ten minute discharge.
3. Contrary to Condition N of your Interim Permit as outlined in the AOPM, Part C.76, no analysis has been performed for sulfur, lead, or mercury; and no documentation was available to indicate that these elements are not present for wastes burned in the Vinyl II and Solvents Incinerators.

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4. Contrary to Condition K of your Interim Permit as outlined in the AOPM, Part C.34.2, weekly inspection of the container storage area near the Central Waste Incinerator could not be confirmed.
5. Contrary to Condition K of your Interim Permit as outlined in the AOPM, Part C.33., you were found storing a container of hazardous waste that had a hole in the drum cover.
6. Contrary to Section 8.4.2 A. of the Hazardous Waste Management Plan, your facility does not analyze a representative sample of wastes received from off-site to verify the information on the manifest.
7. Contrary to Condition S of your Interim Permit as outlined in the AOPM, Part C.47, and Section 8.4.3 of the Hazardous Waste Management Plan, the asbestos impoundment is not managed as a hazardous waste facility.
8. Contrary to Section 8.3.5 A.1) of the Hazardous Waste Management Plan, water discharges from the Northwest Landfill are not regulated under a N.P.D.E.S. permit.

While the Department recognizes the need for drains to allow excess water to drain from ash collection hoppers, the drains should not be open during transit.

As an operator of a treatment, storage, and disposal facility accepting out-of-state wastes, you are responsible for all the requirements of Section 5.4 of the Hazardous Waste Management Plan, as noted in Section 5.4.6 A. of the Hazardous Waste Management Plan.

Spillage and messy housekeeping in the areas of the API separator, slop oils tank, and around Tank 410 associated with the Vinyl II Incinerator should be cleaned.

Monitoring wells which are no longer being used should be grouted to prevent contamination from the surface. Also, perimeter wells were observed to be holding water between the well casing and the protective steel cover. One perimeter well did not have the proper cap on the casing.

Since slop oil and API separator sludge may be burned in the Rotary Kiln Incinerator for fuel value, please submit the heating value for these materials.

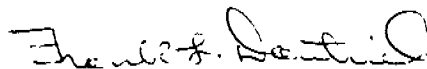
These violations and other deficiencies were brought to the attention of Mr. David Graham and Ms. Carole Tuttle at the time of the inspection.

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Action must be taken to correct the above violations within thirty (30) days of the date of this letter. The Hazardous Waste Management Division shall be notified in writing within that period of the corrections which have been made or which will be performed regarding these violations. Please include in this notification the steps which have been or which will be taken by management to prevent any recurrence of these violations.

Thank you for the cooperation and courtesy extended during the inspection.

Sincerely yours,



FRANK L. DAUTRIEL
Enforcement Program Manager

JLA:bjh

Enclosure