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Rendez

Interoffice Communication

To R. E. Lehmkuhl
From J. J. Hall
Date November 21, 1979
Subject 1979 REGULATORY ACTIVITY

Information per your request:

CITATIONS AT PLANTS:

LCCP No OSHA inspections or citations in 1979. Two citations issued in 1978 were resolved in 1979: (1) Alcohol loading rack house-keeping and (2) escape respirators (Olin phosgene release).

LC VCM No OSHA inspections or citations

Pending litigation on EPA incinerator compliance. No enforcement action yet.

Letters from EPA on 4/4 and 6/26 requiring remedial action to correct wastewater discharge violations. No further action by EPA.

BALTIMORE Three OSHA visits but no citations issued.

Letter from Maryland Water Resources Administration on 12/18/78 listing wastewater violations since December 1977. Conoco ordered to appear before MWRA to answer non-compliance charges. Meeting held on 1/18/79. Action plan developed by Plant. MWRA letter of 1/19/79 states that corrective actions have been taken.

October 9, 1979 letter from EPA - notice of violation. EPA to take enforcement action if the State doesn't. Plant discussed with the State and provided action plan. Final outcome still pending.

NEWARK No inspections or citations in 1979. There were two non-serious citations without penalty in November 78.

OKC No citations to date. (We have been told that we will receive one on the rupture disk release incident.)

HAMMOND No inspections or citations.

ABERDEEN Two OSHA inspections: (1) a one-week industrial hygiene inspection resulting in no citations and (2) a safety inspection resulting in one "serious" citation and two "non-serious". The serious citation involved unguarded electrical equipment. There was a \$360 fine.

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ABERDEEN (Cont'd) A letter was received from the EPA requiring the plant to show cause why relief valve discharges should not be referred to U.S. Attorney for prosecution. Action plan was discussed with EPA. No further action.

ETHYLENE OXIDE Industrial hygiene monitoring has shown that we are meeting our 10 ppm exposure standard. A nitrogen purge system has been installed for the E.O. unloading lines at the rack.

REGULATED AREAS - VCM East end of block I: Evaluating results of fixed point monitor data.

Tops of EDC Tanks: Waiting on results of monitoring from laboratory.

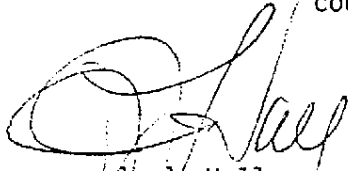
ABERDEEN LEAD STANDARD COMPLIANCE PROGRAM

Compliance program has been established and carried through with minor exceptions noted below.

Mechanical ventilation system appears to be controlling the hazard except for the color weigh room. Contract to modify the color weigh room has been let - awaiting arrival of materials

Respiratory protection has been shown by I.H. monitoring to be unnecessary except for the color weigh room.

The requirement to construct "industrial hygiene facilities" (lunchroom, change area, showers, etc.) has been stayed by the courts. This portion of the plan is "on hold".



J. J. Hall
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