



Interoffice Communication

To VCM Plant Employees
From J. A. DeBernardi
Date June 8, 1979
Subject Employee Promotion

Effective July 1, 1979 Dan Gostylo, Process Engineer at the VCM Plant, will be leaving the plant group for a new assignment in the Houston headquarters office. Dan will be promoted to Product Supervisor position in the Surfactant Business Area reporting to Jan Vogel, Surfactant Business Area Manager.

Please join me in wishing Dan success in his new assignment.

A handwritten signature in cursive script, appearing to read "J. A. DeBernardi".

J. A. DeBernardi

is
CC: RDG
Distribution
Bulletin Boards
Department Heads
Supervisors

CCR 000066600



VCM Plant

CERTIFIED MAIL #315698
RETURN RECEIPT REQUESTED

Conoco Chemicals
Continental Oil Company
P.O. Box 605
Westlake, Louisiana 70669
(318) 491-5211

June 4, 1979

Diana Dutton
Enforcement Division
Environmental Protection Agency, Region VI
First International Building
1201 Elm Street
Dallas, TX 75270

Dear Ms. Dutton:

In accordance with the conditions of the Continental Oil Company VCM Plant's NPDES Permit No. LA0003476, we are informing our office that a partial by-pass of the waste water secondary treatment system occurred on May 30, 1979.

A) Description of Non-Complying Discharge

On May 30, partial by-passing of the VCM Plant's secondary system at the flood control box occurred for about a 5-hour period during a heavy rain storm. Effluent characteristics of the partial by-pass are as follows:

	<u>PPM</u>	<u>Lbs.</u>
Flow	-	243,000
BOD	(1)	(1)
COD	228	55
TSS	238	58
Ammonia	3.44	0.84
Chlorinated Hydrocarbons (As Ethylene Dichloride)	199	48

(1) Five-day BOD analyses are not yet completed.

B) Cause of Non-Compliance

As was noted above, the by-pass occurred during a heavy rain storm. The VCM Plant secondary treatment system limits the waste water feed to the activated sludge unit by pumping the water from two equalization basins. The normal water level in the equalization basins is held at a low level to allow collection of contaminated water runoff. A rain fall of 0.83 inches was recorded at the Weather Bureau at Lake Charles Municipal on May 29. Local bayou flooding, however, suggested that rainfall at the VCM Plant was much heavier. This rainfall caused

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the levels in the equalization basins to be higher than normal on May 30. A rainfall of 5.5 inches was recorded in about an 8-hour period at the Weather Bureau on May 30. Although the feedrate to the activated sludge unit automatically increases as the equalization basin level rises, the combination of higher feedrates and higher basin levels was not sufficient to hold the runoff from the storm and a small by-pass at the flood control box occurred for a 5-hour period. The maximum overflow rate was about 150 gpm.

C) Period of Non-Compliance

As previously noted, the partial by-pass occurred for about five hours on May 30.

D) Steps Taken to Reduce, Eliminate, and Prevent Recurrence

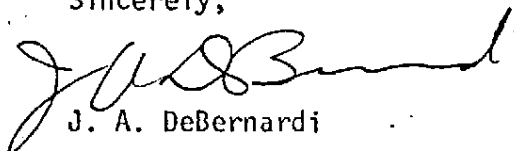
As required by our NPDES Permit, grab samples of the by-pass were collected at one hour intervals. The samples of the by-pass were combined to form a composite sample.

A new pump has been installed at the secondary waste water treatment facility to move waste water from the equalization basins to the activated sludge unit. Several problems have been encountered in the operation of this pump, however, steps are currently under way to solve the problems. When these problems are solved, the level in the basins can be held at about 18 inches lower than the level currently held. Calculations show that if the level had been 18 inches lower before the May 30 rain storm, no by-pass would have occurred.

There has been no visible impact to the receiving waters as a result of the by-pass. As can be seen in the description of the non-compliance, the discharge of all parameters was less than the values allowed by our NPDES Permit. We will send the results of the BOD analysis to you when it is completed.

Should further information be required, please contact G. L. Foshee, Chief Process Engineer at (318) 491-5062.

Sincerely,



J. A. DeBernardi

is

CC: R. A. LaFleur - LSCC

BCC: REL-DAK-CRH-JHN-GLF-PLF-JOG-RLH-MAF-HDG-JWW-DAP

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