

Lake Charles VCM Plant

CERTIFIED MAIL # 8094931
RETURN RECEIPT REQUESTED

May 11, 1981

Mr. William Librizzi, Director
Surveillance and Analysis Division
U.S. Environmental Protection Agency
Region VI
First International Building
1201 Elm Street
Dallas, TX 75270

Dear Mr. Librizzi:

Re: Reconnaissance Inspection Report, Conoco Chemicals VCM Plant
(LA 0003479), and La DRN Inspection 3/23/81

The following is to provide correction to the above-named NPDES Compliance Inspection report, submitted to you under cover dated April 1, 1981.

1) Section K - Self-Monitoring Program, Part 3 - Laboratory "Permittee
Laboratory Procedures Meet the Requirements and Intent of the Permit - No."

The only responses marked "No" which, we assume, resulted in the unsatisfactory result named above, are: (c) Parameters Analyzed Other Than Those Required, and (g) Spiked Samples are Used. Obviously, Part (c) is not sufficient to result in the unsatisfactory rating. For Part (g), Spiked Samples, we are not required by permit to perform spikes, and are unaware of any EPA regulation or requirements to institute a spike sample analysis program. We were informed at the time of the NEIC inspection that a program of this nature was a recommendation and not a requirement. We have no plans to submit a program for spike sample analysis. On this basis, Part 3 should be corrected to indicate the Laboratory Procedures do meet the requirements and intent of the permit.

2) Page 1 of 2, Referencing Section K, Part (g)

An internal program for quality assurance for each analyst has been developed. This is an internal program and will not be submitted for inspection or approval. Results will be a part of normal laboratory recordkeeping procedures, but are not subject to submittal or separate agency scrutiny. Again, this is not a program to run spike samples. Certain suggestions made by EPA during the NEIC Inspection, for calibrations and other improvements in procedures have been implemented; however, these changes are also not required for submittal.

VVC 000013435

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MAY 14 1981

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

File: LCCM

William Librizzi
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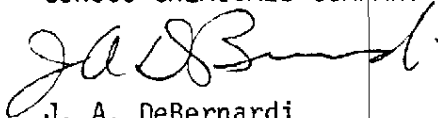
3) Title: Administrative Order Compliance, Mercury Disposal

This page correctly indicates no Administrative Order is pending on action. Under Mercury (Hg) disposal, the report indicates disposed by lab sink to the wastewater system. No mercury as Hg is disposed in the plant sink system; we believe this comment refers to the small quantities of mercuric sulfate in the COD analysis samples which are dumped to the treatment system. Neither EPA or the State provided guidance on how mercuric sulfate in COD samples is to be handled, and if a problem is evidenced here.

If you have any questions or comments, please contact M. G. Hayes at (318) 491-5437.

Sincerely,

CONOCO CHEMICALS COMPANY



J. A. DeBernardi
Plant Manager
Conoco VCM

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BCC: RDG-CRH-MGH-BR-RLH-GLF-PLF-DLD-JWW-JCL

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