

VCM Plant

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

October 21, 1977

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Ms. Adlene Harrison
Regional Administrator
U.S. Environmental Protection Agency
Region VI, Permits Branch (6 AEP)
1201 Elm Street
First International Building
Dallas, TX 75270

Dear Ms. Harrison,

In accordance with the conditions of the Continental Oil Company - VCM Plant's NPDES Permit No. LA 0003476 we are informing your office that the daily maximum limitation for ammonia discharge in waste water at outfall serial number 001 was exceeded on October 17 and October 19, 1977.

A. Description of the Non-Complying Discharge

Waste water discharged from the VCM Plant's secondary treatment system at outfall serial number 001 showed an ammonia concentration of 78.3 pounds of ammonia on October 17, 1977 and 96.3 pounds of ammonia on October 19, 1977. Daily allowable maximum provided for in the plant's NPDES permit is 68 pounds of ammonia per day.

B. Cause of Non-Compliance

Aqueous ammonia is added to the secondary treatment system to enhance biological performance. The aqueous ammonia is continuously added to the treatment unit based on average COD loading of the wastewater treatment process. At the time of non-compliance an additional amount of ammonia was being added to the system on a test basis in an attempt to eliminate a filamentous growth forming in the activated sludge unit. An unexpected two-fold decrease in COD loading of the unit caused the non-compliance to occur related to the ammonia parameter.

C. Period of Non-Compliance

Non-compliance was indicated in the 24 hours composite sample taken on October 17, 1977 (i.e., from 0300 October 16 to 0300 October 17, 1977). The 24 hr. composite of October 19 also indicated non-compliance. (i.e., from 0300 October 18 to 0300 October 19, 1977).

VVC 000012040

Ms. Harrison
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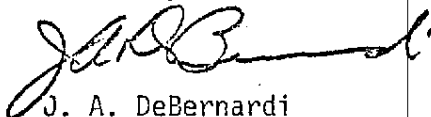
The 24 hr. composite collected on October 20, 1977 (i.e., from 0300 October 19 to 0300 October 20, 1977) indicates the ammonia non-compliance related to daily maximum pounds has been corrected.

D. Steps Taken to Reduce, Eliminate and Prevent Recurrence

Immediate action taken when effluent sample showed ammonia non-compliance was to stop all ammonia addition to the secondary unit. Temporary pumps and hosing were installed to divert part of the effluent stream to a temporary holding pond for reprocessing when ammonia levels return to normal. The plant is investigating the potential of installing an ammonia analyzer on the effluent water to monitor ammonia levels on a continuous basis.

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

Sincerely,



J. A. DeBernardi
Plant Manager

br
cc:
R. A. LeFleur
Executive Secretary
Louisiana Stream Control Commission
Drawer F.C. University Station
Baton Rouge, LA 70803

BCC:
REL-DAK-JEC-CRH-JOG-PLF-GLF-JD

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