

ROY F. WESTON, INC.

ENVIRONMENTAL SCIENTISTS AND ENGINEERS

1 August 1973

REPLY TO:
ROY F. WESTON, INC.
LEWIS LANE
WEST CHESTER
PENNSYLVANIA 19380
215-692-9030
TELEX NUMBER: 83-5348
CABLE ADDRESS: RFWINC

Mr. R. J. Gamblin
Conoco
P.O. Box 605
Westlake, La. 70669

Dear Mr. Gamblin:

During a recent telephone conversation on July 26, 1973, with Mr. Gerlach we briefly outlined the scope of a contract our firm has with the U.S. Environmental Protection Agency to aid in the development of effluent limitations and new source performance standards for the Organic Chemicals Industry. To develop the required effluent limitations and standards, it is necessary both to characterize the type and quantity of wastes which are generated and to identify the types of control and treatment technology which are applicable. The data currently available from Phase I of the project relating to both these areas are not totally sufficient for the development of meaningful effluent limitations.

To provide a realistic data base, Roy F. Weston, Inc. plans to visit selected plants to obtain information relating both to the manufacturing process raw waste loads and to the end-of-process treatment systems. Based on published information available in the open literature, and Refuse Act Permit Applications supplied by EPA, 80 facilities have been selected as candidates for visits. These facilities include plants with continuous and batch manufacturing operations, as well as those with end-of-process treatment systems.

The Conoco plant located at Westlake, La. is included with those facilities we wish to survey.

The Westlake facility was chosen on the basis of vinyl chloride manufacturing operation for which we wish to obtain data leading to the establishment of process raw waste load.

CCR 000035076



The specific information we desire concern:

1. The water quality and type of treatment provided prior to utilization in manufacturing operations.
2. The raw waste loads generated by individual manufacturing processes.
3. The end-of-process wastewater treatment systems which receive wastes from several manufacturing operations.

Personnel from Roy F. Weston, Inc. and EPA representatives will conduct the actual plant visits. Information on manufacturing operations and thus the associated raw waste loads will be derived from:

1. Interviews with operating personnel.
2. Examination of plant design and operating data (process flow sheets, plot plans for sewer layout, and available analyses of process waste streams.)
3. Individual process wastewater sampling and analysis.

To aid the project team in understanding your process or processes, a simplified process flow diagram should be prepared beforehand indicating major unit operations, any pollution control equipment, e.g. dust collectors, all process water and raw material additions to the system and all wastewater sources going to sewer or those that are recycled. Attached are sample flow diagrams which may be used for illustrative purposes.

Information on the performance of wastewater treatment systems, if applicable, will be obtained through:

1. Interviews with pollution control personnel.
2. Examination of treatment plant design and operating data (flow rates and analyses of influent and effluent.)
3. Treatment plant influent and effluent sampling.

Roy F. Weston, Inc. recognizes that most manufacturers consider the following types of information to be proprietary: process information relative to actual production rates; catalyst types and usage; and the particular type and number of unit operations at a specific location. We are willing to sign secrecy agreements with industry to protect such process information. Furthermore, any data not utilized in the study will be returned to the specific manufacturers involved. No data related to this study will be retained by Roy F. Weston, Inc.

However, information which is specifically utilized in the data base must be turned over to EPA upon completion of the contract. If this information is considered to be a "trade secret", it should be marked as such. EPA



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has indicated that information so designated will be exempted from public disclosure pending the manufacturer's submittal of a brief providing affirmative evidence for such a classification. (Licensing agreements are one example of such evidence.)

Every attempt will be made to limit our discussions to soliciting only that information which we believe is necessary to fulfill our stated objectives. In this way, information released to EPA which is considered as a "trade secret" may be kept to a minimum.

The analytical data in the final EPA report will be identified only by product name and there will be no mention of your company in the actual report. In the previous Phase I study, all analytical data was grouped in categories and generally not compared on a product for product basis. Therefore all data collected during this project will be useful in verifying previous categorizations and providing us with a broad data base upon which to make future recommendations.

We plan to conduct our field data collection program from September 1 to October 30, 1973. Currently, we are planning to schedule visits to individual facilities during this eight-week period. We will be calling you within the next few days to schedule a visit during this period. Any questions you may have should be directed to Dave Smallwood or Chuck Mangan.

Very truly yours,

J H Dougherty / cm

James H. Dougherty, P.E.
Senior Project Manager

JHD:js

CCR 000035078

FIGURE 1
CONTINUOUS PROCESS

PHENOL-ACETONE

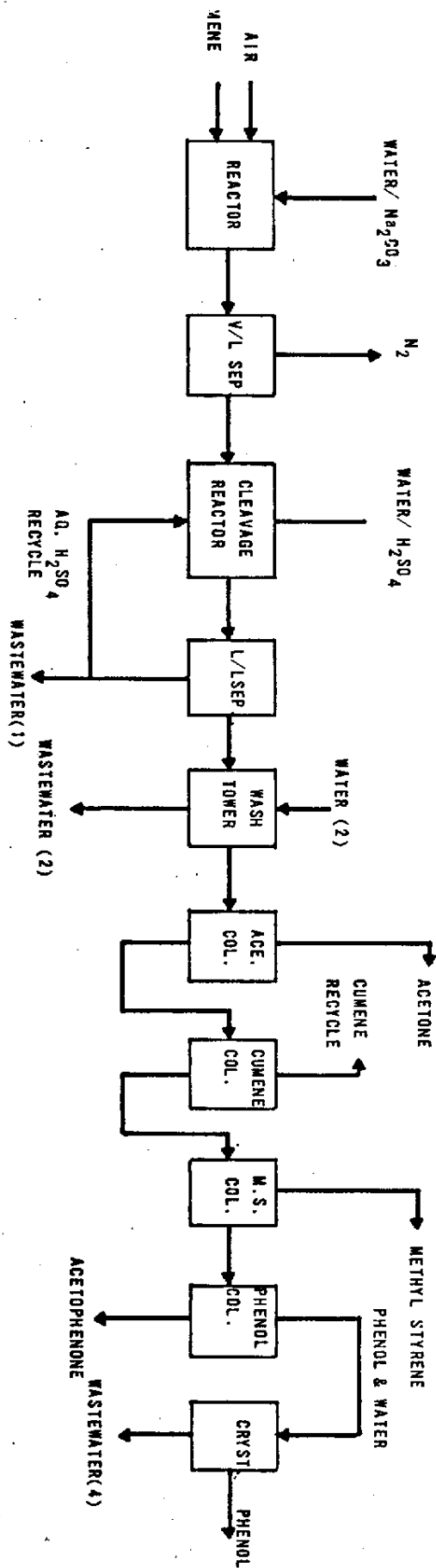
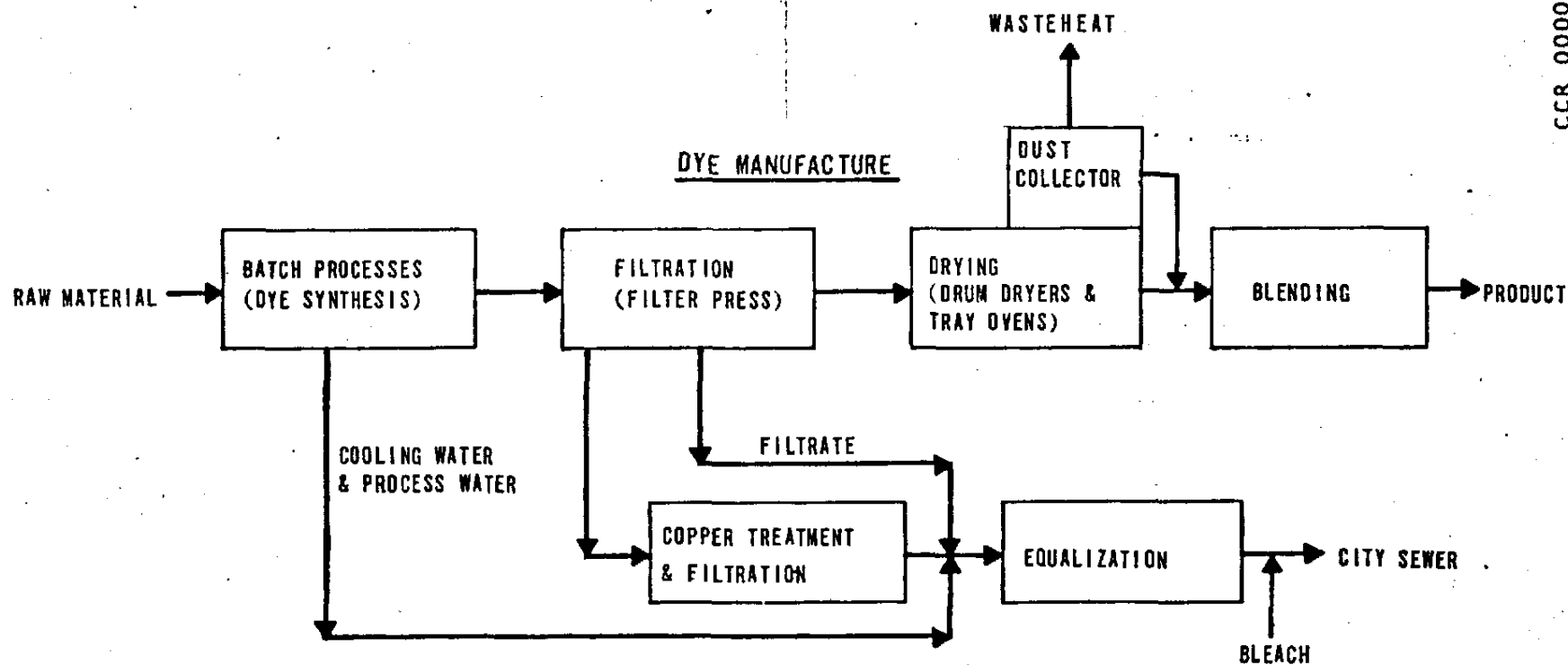


FIGURE 2
SEMI-CONTINUOUS AND BATCH PROCESSES



8/6/73

Roy Huston Study Questions

- 1) ~~Occur~~ air & water both being studied?
- 2) Will byproduct disposal & solid wastes be studied?
- 3) Breaking out raw water use & generation loads by specific processes will take time and will involve operating techniques?
- 4) Water treatment system being licensed - how to work this into EPA's report.
- 5) How many visitors - specific names & titles, especially EPA. Do we have to give sworn testimony. Are we liable for poor data. Will visitors interfere with operations.
- 6) They want all water analysis in plant which is skimpy and will reveal some problems (especially with toxic). We will have to ^{conduct} ~~analyze~~ ^{our own} analysis.
- 7) Can RFW copy plot plans, sewer maps, etc. How about photos.
- 8) Flow diagram will take eng. time if a good map will flow rates is desired. (estimate 8 to 12 hrs).
- 9) Secrecy agreements with EPA have been worthless to date. Why are they changing now. Catalyst data especially a problem.
- 10) I'll be on vacation Sept. 3 to 10th but can change if you wish (no particular problems).
- 11) State air plan filing will conflict with this work to some degree.
- 12) I'll be get a complete version of the final study as the EPA sees it (for UCAI plants only). Strongly fight for this!!
- 13) Present EPA tentative rules exist for ~~air~~ water emissions. The fact that we meet many ~~other~~ of them may cause the EPA to tighten-up the rules.

Call Me at 3 Friday

2 835-
transferred job
to Dave Cullen

CCR 000035082

To *File*Date *8/20/73*

Chuck Mangan called at 11:00 AM (Monday)
and asked for Oct 15th. Will give names of
visitors when he calls back about Oct 1st
2 or 3 other UCM plants being studied also.
Will be here 3 to 5 days. Wants to sample
around stripper & secondary system. Not
interested in cooling towers.

CCR 000035083

TO Rich

TIME _____ DATE _____

While You Were 

M Chuck Morgan

of Ray Westron

Phone No. 215-692 3030

☒ Telephoned

☒ Please call back *ex. 219*

☐ Called to see you

☐ Will call again

☐ Left the following message:-

☐ Returned your call

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405 EAST GRAND
PHONE
(405) 765-4401

To

Date

Survey ~~_____~~Sampling over one
24 hr period.Have been signing
secrecy agreement.Simplified flow
diagram.Sample indiv waste
stream(Prod data
next week

CCR 000035085