



Interoffice Communication

To Jim Leigh, Westlake, Louisiana

From Lew Cresswell, Ponca City, Oklahoma

Date May 27, 1981

Subject Waste Water Effluent, Lake Charles Refinery

I reported to you at our May 22 meeting the approach that Shell and some other petroleum companies are taking with respect to the problem of reporting priority pollutant data on NPDES permit applications. At the recent API meeting, they indicated that they are not reporting priority pollutants in the application, but are including this data in a preamble section. The reason for this approach centers around the EPA's description of what the reported priority pollutant data means. The data for only one sample (as is the case for the Lake Charles Refinery) is reported as a daily maximum on the application. Obviously, this could pose severe problems for us as it sets a maximum daily discharge if taken literally. Shell indicates that they are refusing to "play ball" with the EPA on this issue. Reporting the data as EPA proposed, Shell feels, may soften their position in any future litigation.

At this point I am not proposing that the Lake Charles Refinery follow Shell's approach. However, I do think that all of Conoco's refineries should be consistent in how the priority pollutant data is reported in the permit applications. It is my understanding that the Lake Charles Refinery will consult Clyde Hampton on this subject before submitting the permit application to the EPA.

I also reported to you that the proposed EPA effluent guidelines for refineries are due to be reissued in the near future. The 1982 capital budget designs that we have developed for you were based on the originally proposed guidelines of over a year ago (with some assumed modifications that I spelled out for you in a May 13 letter). Some of EPA's proposed changes to the guidelines were reviewed at the recent API meeting in Chicago and include adding coking, product hydrotreating, catalytic reforming, and sulfuric acid alkylation to the flow model for calculating the allowable pollutant load. The overall results should be a loosening of the effluent requirements from what was contained in EPA's originally proposed guidelines, although the detailed proposal has not been formally released by the EPA.

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We agreed to keep you informed of any changes in the proposed effluent guidelines as they become public. If it becomes obvious that some of the equipment that we have proposed for the 1982 budget may not be needed, you would want to know this as soon as possible to modify your 1982 budget proposals. Of course, if Congress should extend the 1984 compliance deadline, this could perhaps push some of the equipment into later years' budgets. It is highly possible that none of this information will be available before submittal and approval of your 1982 Capital budget.

The current Calcasieu River waste load allocation study could also have some impact on future Lake Charles Refinery effluent requirements. We understand that results of that study will be made available in the near future.

We plan to incorporate your review comments into the 1982 capital budget designs for issuing next week. We will convey the designs individually to CED's

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Planning and Estimating Groups this week as quickly as we can incorporate the review changes. CED has been requested to develop separate cost estimates for each of the five designs. We do not plan to evaluate the existing sour water strippers as we understand that PED Refining Division personnel are currently working on this project.

You requested that we provide assistance in evaluating and improving the performance of the existing effluent flotation unit. We have scheduled this work to immediately follow three small Ponca City Refinery Capital budget designs.

Lew Cresswell
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