



SHELL OIL COMPANY

ONE SHELL PLAZA
P.O. BOX 2463
HOUSTON, TEXAS 77001

April 14, 1977

FILE

RQ 3.4

*drawn
under*

PLAINTIFF'S EXHIBIT

SH-2404

Mr. Robert B. Schaffer, Director
Effluent Guidelines Division (WH-552)
U. S. Environmental Protection Agency
Washington, D. C. 20460

Dear Mr. Schaffer:

This is in response to your letters to our refinery locations which requested that they complete the Petroleum Refinery Industry Survey. These letters were received by the refineries during the week of February 14, 1976. We have enclosed Portfolio B of the Survey for our Anacortes, Ciniza, Deer Park, Martinez, Norco, Odessa, Wilmington and Wood River Refineries. Portfolio A for the first six locations was submitted on March 18, 1977 and for the last two on March 25, 1977 under separate cover.

In general, in completing Portfolio B, we did not list chemicals as purchased or manufactured if we felt that the likelihood of their presence in wastewaters, in any significant concentrations, was extremely remote and not verified by analysis. Nor did we list hydrocarbons if they are not purchased or manufactured in relatively pure form. Several examples of chemicals excluded based on the above criteria are listed below:

1. Likelihood of presence in significant quantities is extremely remote and not verified by analysis.
 - a. Laboratory reagents because the quantities involved are so small.
 - b. Asbestos because present-day safety procedures require careful handling.
 - c. Chemicals which may be present in additive packages for hydrocarbon products if they would be expected to remain preferentially in the hydrocarbon phase; one exception is lead which was included because of the quantities of lead additives handled.

DPMC-09035

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2. Hydrocarbons not purchased or manufactured as relatively pure materials.

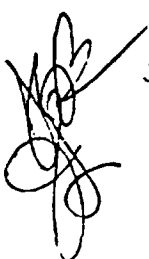
- a. Heavy aromatics which may be present in extremely low concentrations in crude oil or high boiling petroleum products.
- b. Light aromatics which are present in gasoline range materials, such as catalytic reformates, but which are not further processed for recovery as relatively pure aromatic chemicals.

If your staff has questions or comments about the above approach, we will be glad to discuss them.

Very truly yours,

Original Signed By:
A. G. SMITH

A. G. Smith
Manager, Manufacturing
Environmental Conservation



JSB:pjw

Enclosure

bc - w/o enclosures

Health, Safety and Environmental Support -
Oil and Chemical Products - Manager
Health, Safety and Environment - Environmental
Affairs - Mr. J. D. Hallett