

INTER - OFFICE MEMORANDUM

S. R. SHEERAN 4-

JAN 8 1974

Tenneco Chemicals, Inc.

TO: Dr. S. R. Sheeran AT: Saddle Brook DATE: January 3, 1974

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SUBJECT: TRIP REPORT
HOUSTON, TEXAS
DECEMBER 10 - 12, 1973

The primary purpose of this trip was to participate in a "brain-storming" session on Petro-Tex Chemicals' Pollution Control Program. Other participants in this session included: Dr. Bob Pruessner, Petro-Tex; Jack Adams, Tenneco Inc; and Ted Ray, Newport News. Mr. Adams had arranged for all of us to attend an M.C.A. Workshop on the Federal Water Pollution Control Act of 1972. I also spent a half day in a status review at our Pasadena plant.

PETRO-TEX

This consisted principally of discussions on the "why, what, and when" aspects of the items on the Petro-Tex Pollution Abatement Program schedules. (See attached). As is usually the case with this type session, no real decisions were reached.

It appears that Petro-Tex has laid out an ambitious program. As far as one can judge in this field of constantly changing rules, it should be adequate, but it is going to require a lot of attention and push at all levels to carry it out.

There is a similarity between many of their problems and ours, particularly, at our Pasadena plant. In view of this, we should try to share information and experience where possible. Petro-Tex is ahead of us in incinerating vent gas streams from process units. We probably have broader experience with various types of waste water treatment processes -- at least at the laboratory and pilot plant levels. We are both faced with a potential problem in disposing of solid wastes, especially chlorinated materials, in the foreseeable future. A joint venture on this would be something to consider for the future.

M.C.A. WORKSHOP

With one or two exceptions, E.P.A. speakers were from the Dallas Region VI office. The State participants were from the Texas Water Quality Board Staff, so the slant was Texan. Items of interest are listed below:

TEN 3930

1. E.P.A. Permits -- James C. Steibing -- Chief of Permits
E.P.A. Region VI

- a. E.P.A. is on a crash program to issue permits. By law all industrial dischargers must have a permit by December of 1974 or be in violation. Technically, having an application on file but not acted on is no defense, thus, E.P.A. is driving to process all applications and admittedly is not doing a good job in all cases. It seems to be a case of getting something on paper to comply with the law and then adjusting it later if it seems necessary. The same time constraints make E.P.A. reluctant to negotiate or spend more than the bare minimum of time in any discussions during the proceedings.
- b. Industrial Pretreatment Standards for discharge to public sewers are not handled as part of the permit program but by a separate section.
- c. Their position regarding Gulf Coast Waste Disposal Authority still is not completely clear, though, it looks as if G.C.W.D.A. will be the named permittee and the E.P.A. relation to the individual companies only an indirect one.

2. Industrial Participation in Municipal Systems -- Charles Sutpin --
E.P.A. Washington

- a. E.P.A. can proceed directly against an industry to enforce pretreatment standards, though, probably will not except in cases where the municipal system is clearly not attempting to do so.
- b. If the industrial discharger complies with the applicable pretreatment standards, and the municipal system does not install secondary treatment by the June 1977 deadline, the industry is not required to reduce its discharge of compatible pollutants (B.O.D., S.S., Coliform Bacteria)
- c. If it can be shown that the municipal system does in fact consistently remove some portion of noncompatible pollutants, industrial dischargers may get credit for that in determining their allowable discharge into the municipal system. For example, if the City plant removes 50% of the NH_3 across their system, guidelines would allow Plant X to discharge 10 lbs. of NH_3 per day to the river then the actual allowable discharge to the City system would then be 20 lbs. - 50 % reduction equaling 10 lbs. final discharge to the river.

3. Miscellaneous Questions Answered

- a. Discharge limits are generally on a gross basis, that is assuming that the intake water is clean. Where it can be shown that intake water is significantly polluted, limits may be set in

permits on a net basis. This may be important to us at some plants.

- b. The addition of a new facility to an existing complex (ex. Pasadena) in most cases will be considered an expansion rather than a new operation subject to more stringent limits for new sources.
- c. There are no hard and fast rules defining what is economically feasible. E.P.A. engineers must use judgment. Policy is to be reasonable.
- d. A significant change, which would require amendment of a permit, is not clearly defined. As a guide, a 25% change in any major parameter or process change resulting in the introduction of new pollutants would be considered significant.
- e. E.P.A. needs 180 days lead time before the operation starts to process a permit. E.P.A. does not issue construction permits as such, but it is wise to review plans with E.P.A. before beginning construction.
- f. Regulation of storm water run-off is not a high priority item with E.P.A., however, when contamination by oils or toxic materials is possible due to storm run-off, the industry must be aware that violations and prosecution is a distinct possibility and necessary precautions should be taken.

PASADENA PLANT REVIEW

1. There is a good chance that the Waste Treatment Plant will be substantially completed by the June deadline, so that shakedown can be accomplished in time to meet the August deadline for compliance.
2. There has been quite a bit of concern about the amount of work needed to conform to the T.A.Q.B. Reg. V on Hydrocarbon emissions. Methanol is now exempt and the compressor seal program proving satisfactory, so that only relatively minor actions will be required to direct two streams to existing incinerators or flares in order to comply with the regulation.
3. I reviewed with Bob Churchwell the terms of the T.A.Q.B. permit for the P.V.C. plant and we concluded that we do not have any obligation to supply any more information until the plant is operating.


W. P. Anderson

WPA:ab
Attachment