



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

23 JUN 1978

K. C. H.
Tech. Sec. Lab.
JUN 27 1978

Mr. K.C. Hunt
Continental Oil Company
P.O. Box 1267
Ponca City, Oklahoma 74601

Dear Mr. Hunt:

Thank you for your June 12, 1978, response to EPA's April 11, 1978, request for information on waste streams at Continental's Ponca City, Okla.; Billings, Mont.; and Lake Charles, La.; refineries. The data presented therein appears complete, however further questions may develop during the data interpretation phase of our investigation. In that case, you will be contacted for resolution of any problems.

Again, your cooperation is appreciated.

Sincerely yours,

Kerri C. Brothers

Kerri C. Brothers
Petroleum Section
Chemical and Petroleum Branch

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Mr. Kenneth C. Hunt
Coordinator of Environmental Affairs
Continental Oil Company
P.O. Box 1267
Ponca City, Oklahoma 74601

Dear Mr. Hunt:

The Emission Standards and Engineering Division (ESED) of the Environmental Protection Agency is investigating the need to control benzene and other volatile organic compounds (VOC) resulting from the handling and disposal of refinery wastes. This action is pursuant to Sections 110, 111 and 112 of the Clean Air Act, as amended, June, 1974, (see Enclosure 1).

Certain data are needed to quantify the atmospheric emissions from refinery waste handling and disposal. Therefore, we are requesting, under authority of Section 114 of the Clean Air Act, that you provide the information indicated in Enclosure 2 for your refineries at Ponca City, Oklahoma; Billings, Montana; and Lake Charles (Westlake), Louisiana. Wastes from BTX production and storage facilities are to be included.

In summary, we are requesting that you supply us with the quantity and composition of all refinery wastes that contain benzene and other VOC. In addition, the techniques you are currently using or plan to use to handle, store and dispose of these wastes are to be identified and described. Best estimates are to be prepared when specific data are not available. Enclosure 2 is to be completed and submitted for each of the aforementioned refineries by May 31, 1978.

If you believe that disclosure of the information we request would reveal a trade secret, then you should clearly identify such information and set forth reasons for your claim, including supportive data or legal

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authority. Any information subsequently determined to constitute a trade secret will be protected under Title 13, U.S.C. Section 1905.

If you have questions regarding this request, please contact Ms. Kerri C. Brothers at (919) 541-5371.

Your cooperation will be appreciated.

Sincerely yours,



Don R. Goodwin

Director

Emission Standards and
Engineering Division

2 Enclosures

cc: Mr. P. R. Samsell

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ENCLOSURE 1

EPA's Information Gathering Authority
Under Section 114 of the Clean Air Act

Congress has given the Environmental Protection Agency broad authority to secure information needed in the development of standards of performance for new stationary sources under Section 111 of the Clean Air Act (42 U.S.C. 1857c6). Among other things, Section 114 of the Act (42 U.S.C. 1857c9) authorizes EPA's Administrator or his authorized representative to make inspections, conduct tests, examine records, and require owners or operators of emission sources to submit information reasonably required for the purpose of developing such standards. In addition, the EPA Office of General Counsel has interpreted Section 114 to include authority to photograph or require submission of photographs of pertinent equipment, emissions, or both.

Under Section 114, EPA is empowered to obtain information described by that section even if you consider it to be confidential. You may, however, request that EPA treat such information as confidential; as discussed below, such a request should be made when you submit the information. Information obtained under Section 114 and covered by such a request will ordinarily be released to the public only if EPA determines that the information is not entitled to confidential treatment.* Proposed procedures to be used for making confidentiality determinations, proposed substantive criteria to be used in such determinations, and special rules governing information obtained

* Section 114 requires public availability of all emission data and authorizes disclosure of confidential information in certain circumstances. See 40 FR 36902, 36912, (September 1, 1976).

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under Section 114 are set forth in 40 CFR Part 2 published in the Federal Register on September 1, 1976, (40 FR 36902).

If you believe that disclosure of any information EPA requests would reveal trade secrets or other confidential information, you should clearly identify such information at the time it is submitted [see Section 2.203(b)]. If you wish, you may also set forth reasons for your claim and include supportive data or legal authority at the time the information is submitted (in most cases, there will be an opportunity to do so later if a question concerning public availability of the information arises). If no such claim accompanies the information when it is received by this Agency, it may be released to the public without further notice to you.

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ENCLOSURE 2

INSTRUCTIONS:

The enclosed chart is to be filled out completely. When specific information is not applicable to your facility, enter "NA" and provide an explanation. Prepare best estimates when actual data are not available.

QUANTITY - Give the annual quantity of each waste produced in metric tons.

METHOD OF GENERATION - Classify waste generation method as continuous, batch, turnaround, etc. If waste generation is intermittent, also give frequency.

COMPOSITION - Give composition by weight for each waste where possible. Composition estimates may be acceptable in lieu of extensive testing. As a minimum, the breakdown should include benzene and total VOC.

DISPOSAL METHOD - Brief description of disposal method for each waste. If waste disposal is contracted, give name and address of contractor.

STORAGE FACILITIES - Describe type, size and turnovers, i.e. open piles, pits or ponds, fixed roof storage tanks or floating roof storage tanks.

TRANSFER METHOD - Describe method of transferring each waste from the point of generation to the point of disposal.

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