

Interoffice Communication

To Jim Leigh, Westlake, Louisiana

From Lew Cresswell, Ponca City, Oklahoma

Date July 8, 1981

Subject Refinery Effluent Guidelines

You asked to be informed of any changes to the proposed federal effluent guidelines for refineries. I have been in contact by phone with Ed Blum of Union Oil, the Chairman of an API committee dealing with the EPA on Refinery guidelines. He says that a new set of proposed guidelines are due to be published in the Federal Register before the end of this year. The new proposal will be slightly more lenient than EPA's previously proposed guidelines that we used as a basis for your 1982 Capital Budget projects. Final guidelines will probably not be out until next year and are expected to be significantly more stringent than today's effluent guidelines.

We have calculated the effect of the newer proposed guidelines on the Lake Charles Refinery with respect to the 1982 Capital Budget projects. There is a chance that filtration of the final effluent may not be required if the existing flotation unit can be optimized to give a much better quality effluent than it has in the past. We plan to provide assistance later this summer as you requested in optimizing the unit. However, at this time the safe approach might be to leave filtration in the 1982 budget. It appears that none of the other Refinery budget projects will be affected as a result of EPA's newest proposal.

In recent conversations with Conoco Lake Charles Chemical Plant personnel, they indicate that significantly more stringent effluent requirements are expected from the State of Louisiana. These limitations will be based on the Calcasieu River waste load allocation study. Apparently, the State is taking the lead and may propose stringent effluent requirements for BOD and suspended solids. All of this hinges on the State's receiving certification.

Initially, chemical plants in the Lake Charles area will be asked to reduce their effluent levels. The Hercules Plant was recently required to cut their BOD level by 50% and solids by 75%. Hercules was also given a short compliance schedule. The State has indicated to LCCP personnel that other chemical plants in the area will be required to make significant reductions as their effluent permits come up for renewal (no specific reduction numbers were quoted). Following the chemical plants, refineries will also be asked to reduce their effluent levels. State regulatory personnel apparently indicated that required effluent reductions in refineries will not be as large as that for chemical plants.

At this time, it is not known what impact the State's actions may have on the Lake Charles Refinery's waste treatment requirements. Until the situation becomes better defined, we cannot project what additional treatment if any, will be required for the Refinery. Please advise us of any information that

Jim Leigh
Page 2
July 8, 1981

you may obtain on this subject in future discussions with the State, as this could help in determining waste treatment requirements for both the Chemical Plant, and VCM Plant.

Lew Cresswell

L. W. Cresswell
Supervising Process Engineer
Engineering Services Division
Process Engineering Department

bd
cc:LDW:RGG:LES:SHD:DHS:KOH:RSJ
Joe Ledvina, Houston
Irv Wagner, Westlake
Rich Gerlach, Westlake
Bill Ritter, Westlake

EV 840.7

MCD 000002522