

To: Distribution

From: D. E. Stacy
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VISTA

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Communication

Subject: Update on Environmental Issues

A meeting was held on Friday, October 16, to address several recent environmental issues at the LCCP and their impact on other environmental work already in progress. Within the past few weeks a response to the Reclassification Petitions for the LCCC surface impoundments and new OCPSF Effluent Guidelines pertaining to wastewater treatment were received from the Louisiana Department of Environmental Quality (DEQ) and the United States Environmental Protection Agency (EPA), respectively. Refer to Table 1 for the impact of the OCPSF Guidelines on the LCCC NPDES Permit. The purpose of the meeting attended by J. C. Ledvina, T. W. Heller, M. G. Hayes, P. L. Fetzer, and members of Process Engineering was to develop a plan that would combine these new issues with the existing TCLP and Stormwater Relief Projects.

As a result of this meeting a new Environmental Plan will be developed. The revised plan will include an update of the Federal and State regulations, a characterization of all of the waste streams to be affected, and the results of a technology search aimed at locating potential waste treatment alternatives. The culmination of this work will result in a new Environmental Plan with alternatives to biological treatment and possible solutions to current and future environmental issues. These alternatives can then be evaluated to determine the most cost effective solutions necessary to comply with existing and anticipated environmental regulations that are attempting to regulate surface impoundments out of existence. Table 3 summarizes the action plan developed in the meeting.

If you have any questions or comments, I can be reached at extension 5185.

David E Stacy

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Attachment

Distribution: JAD THH PDC RHG GLF JMK SAR JCS CRW DDZ MLA MDB DWF
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DISCUSSION

In a meeting on Friday, October 16, two recent environmental issues at the LCCP were discussed along with their connection to existing environmental projects already in progress. A response to the LCCC Reclassification Petitions for the LCCC surface impoundments and new Effluent Guidelines necessitate an evaluation of the current scope and direction of TCLP and Stormwater Relief Projects. Efforts will begin immediately to compile the information needed to update the Environmental Plan such that it will include alternatives to biological treatment and possible solutions to expected environmental issues.

The Louisiana Department of Environmental Quality (DEQ) has requested the data necessary to classify the LCCC surface impoundments as non-hazardous facilities (see attached letter). This will require extensive sampling and testing of the sludge and wastewater in all of the surface impoundments. Process information and flow diagrams will also be needed to support the test results and explain any listed hazardous waste that may be found in the samples as de minimus losses. Mike Hayes has received approval to hire a contractor with expertise in EPA sampling and analysis procedures for reclassifying the surface impoundments. Efforts are currently underway to prepare a bid basis and to compile a list of potential contractors qualified to complete the sampling and testing.

After the testing is complete and the back-up materials are prepared, the DEQ will review the information and make a determination as to the status of the surface impoundments (see attached Diagram 1). Solid Waste Permit Applications are the final step in classifying the surface impoundments as non-hazardous facilities. When the proposed TCLP hazardous waste regulations are final, this same information can be used in the preparation of Hazardous Waste Permit Applications if no acceptable alternatives to biological treatment in surface impoundments are identified and implemented.

In response to the Clean Water Act, the United States Environmental Protection Agency (EPA) issued new wastewater effluent guidelines and standards that limit the discharge of pollutants by sources in the Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) industry. These regulations are final and could significantly reduce the discharge levels in the existing NPDES Permit below the treatment capabilities of a biological system. The attached Table 1 compares the existing permit levels with the limits proposed by the new effluent guidelines. The proposed levels are given as concentrations, therefore final permit limits will be determined by the wastewater flow rate which will have to be negotiated with the regulatory agencies. The limits in the attached Table 1 are based on a 15MM pound per day effluent flow rate.

The new effluent guidelines are finalized but cannot be enforced until they are incorporated into new wastewater discharge permits. The EPA has expressed a desire to wait until our existing NPDES Permit expires on September 29, 1991 before incorporating the new limits. However, Vista at present does not have a wastewater permit with the

state. This allows the DEQ to issue a new discharge permit at any time. At the present time, Conoco and Vista wastewater discharges exceed the Waste Load Allocations to Bayou Verdine set by the DEQ. Conoco, however, has a DEQ issued discharge permit that is within the Refining Industry Effluent Guidelines. When Vista receives a DEQ permit incorporating the new OCPSF Industry Effluent Guidelines, the two companies' combined wastewater discharge to Bayou Verdine will be below the limits established by the DEQ. This indicates that the DEQ may move quite rapidly to issue a wastewater discharge and bring the Waste Load Allocation into compliance with EPA mandates.

The Reclassification Petition and new Effluent Guidelines require a few changes in the current scope of the TCLP and Stormwater Relief Projects. Recent excursions at stormwater outfalls EPA-004, 018, and 023 initiated a review of the existing stormwater handling system. It was agreed that there was not sufficient expertise in plant to completely evaluate the existing system. At a kickoff meeting in early October, R. D. Zeplin (a GED in-house contractor) was recommended to initiate work to define the current system and develop options to improve the handling of stormwater. A summary of this meeting was issued by H. E. Seale on October 7, 1987.

The scope of this work may increase in three areas. Expanding the process flow diagram preparation to include wastewater streams as well as stormwater will provide information needed in the Reclassification Petition. This information will also be necessary to evaluate treatment options that will lead to compliance with TCLP hazardous waste regulations. The scope will be expanded to include prioritizing options that will eliminate the need to treat stormwater in wastewater facilities. Similar studies at LCLAB and LCVCM will also be necessary.

Proposed TCLP hazardous waste regulations will expand the definition of a hazardous waste to include liquid and solid wastes that contain benzene, toluene, ethylene dichloride (EDC), vinyl chloride, ethylene oxide, and chloroform at part per billion (ppb) levels. Biological treatment by itself will not reduce wastewater to these low levels. Current TCLP efforts have concentrated on sampling the solid and liquid waste streams in the LCCP. The attached Table 2 gives a summary of the proposed contaminant levels and test results for most of the LCCP waste streams. There are still a few waste streams that need to be tested such as the decoking water and solids.

The proposed TCLP regulation is expected to be finalized in mid-1988, but it is not known when compliance will be required. The EPA re-opened the comment period on the wastewater section of the proposed TCLP regulation. This may indicate either changes or delays in finalizing the wastewater section. The current plan is to use the test results of the Reclassification Petition and in plant samples combined with hydraulic loading data from the Stormwater Relief Project and other sources to define all of the waste streams in the LCCP. This information will allow for a more thorough evaluation of all of the potential waste treatment technologies that will meet the contamination levels required in each waste stream.

As a result of this meeting, work will begin on a new Environmental Plan (Table 3) with an updated regulatory forecast, a characterization of all the waste streams, and a detailed search for environmental treatment technology and expertise. The regulatory forecast will be based on the latest EPA Regulatory Agenda and DEQ proposals. Recent proposed regulations are focusing on eliminating wastewater treatment impoundments, therefore the technology search will concentrate on alternatives other than biological treatment. The characterization of the waste streams will determine which treatment alternatives are suitable to each individual waste or combinations of wastes. The completed Environmental Plan will present treatment alternatives and possible solutions to current environmental problems. It will serve as a necessary tool to determine the most cost effective way to comply with present and future environmental regulations.