

TO: File 296

FROM: V. E. Messick
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Interoffice
Communication

SUBJ: Information from Other Companies on
Benzene Waste Operations - Update

VISTA

I have been calling other companies to learn about their approach under Benzene Waste Operations Regulations. This memo is a summary of those contacts.

Patty Palmer - Oxy Lake Charles 318-437-8277

1. Consider the quench settler to be a part of their process. The organic stream from the quench settler is recycled and cracked. They do not consider this stream to be subject to the regulations.
2. Installing a dilution steam system which will not be subject to the regulations because it is a part of the process. Patty said that the company really studied the decision not to call the stripper part of the process, and are firm that it is not subject to the regulation.

Jim Hutchinson - Oxy Corpus 512-242-8110

1. Was not very familiar with the specifics of the ethylene unit.
2. Jim felt strongly about how waste is defined. Waste is a stream that is put to the sewer and sent to an API separator or some classic wastewater system. I described our stream to him and he felt that the blowdown from the quench settler system would be a waste. The HAD stream would not be a waste stream.

Bill Mc Clain - Conoco

1. Feels strongly that the stream is not subject to rule. It is a coproduct. HAD is also bought from others namely Citgo. I checked a recent HAD price. 5 cents per pound. Kerosene 9.3 cents per pound. Crude approximately 6-7 cents per pound.
2. Knows that RTP people didn't think they had spent caustic streams covered by the waste definition so added references to the regulation so this stream would be regulated.
3. Not a waste management unit because part of the process. Was originally built with the plant.

Built as process equipment. We wouldn't have spent the money 20 years ago if it wasn't part of the process.

4. Other streams are like LAC are in the same situation.

5. Process emissions will be or are regulating the process streams. The NESHAP regulations are aimed at streams other than the process streams.

Mel Vyvial - Chevron Cedar Bayou

1. Facility not subject to the Benzene NESHAP.

2. Did not count any oil streams from quench settler in TAB. Only benzene NESHAP stream from quench area is blowdown from dilution steam system.

Paul Hunt - Phillips Sweeny (409) 491-2391

1. The water and hydrocarbon from the quench settler are put into the Oily Water Sewer. There is a convenient place to recover the oil at the waste treatment unit.

2. Considers the quench settler to be part of the process.

3. When I described our HAD stream to him, he thought this would be similar to an aromatic stream leaving their debutanizer and would not be a waste.

Nick Spiridakis - Chevron Calif. - 510-242-5529

1. Nick is responsible for refineries as well as ethylene plants. He has worked mostly with API, but some with CMA on the issue. Seemed very knowledgeable.

2. Equipment that is an integral part of the process is not subject to the regulation. His test of integral is if you can take the equipment out of the process and still keep operating. On the quench settler they have taken the position that the water is recirculated for cooling and that the process would not work without it so it is not subject to the regulation.

3. Streams leaving the settler would be wastes. He thinks the organic stream leaving the settler is a waste. I described that the HAD went to an intermediate tank before going to the refinery crude tank. He said he thought that the intermediate tank would be subject to controls.

4. Nick said the agency was considering raising the limit on organic streams covered by the NESHAP from 10 to 1000 ppm and so our stream may be exempt with the final rule if it is below 1000 ppm.

5. Nick also said the agency was considering changing 1 metric ton of exemption to 2 metric tons and doing away with the 25 kg per stream limit.

6. Nick called back on Dec. 21 to confirm what was done with the quench settler material. He said that the whole quench stream was sent to the wastewater system. There is a DAF on the wastewater stream and some oil is recovered there, but not at the settler itself.

Steve Jackson - Oxy - Chocolate Bayou (713) 393-5404

1. Every stream that would have gone to OWS is counted as a NESHAP stream. Anything that is recycled in the process is considered part of the process. Point of generation is defined at where material enters the sewer.

2. Steve said he sat in about 75% of the EPA/CMA meetings where this was discussed. The EPA wanted to regulate streams up in the process, but backed off. The agreement as he understands it is that material is a waste when dumped to the sewer. He said Annette Stanley of CMA could give additional insight.

Annette Stanley - CMA

1. Annette said CMA's position was that point of generation was the first place where there was an air/water interface. They have argued that there are many measurement problems if point of generation is established before that. She said EPA had rejected this argument.

2. I briefly described the quench settler and the HAD stream to her. She said that as long as we could defend that the equipment was an integral part of the system, we should be OK, but gave me the standard disclaimers. She gave me the name of the work group leader for the Benzene NESHAP. Norman Morrow 504-359-7226 with Exxon.



V. E. Messick

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