



Shell Oil Company
Interoffice Memorandum

AUGUST 3, 1982

PLAINTIFF'S EXHIBIT

SH-3061

811.5.6

ENVIRONMENTAL	
DATE	8-16-82
NAME	R.V. Mattorn
	RETURN TO EVC FILE
X	COPY IN EVC FILE
	FOR EVC INFO ONLY
COPY	(H)
CIRC.	

FROM: MANAGER, ENVIRONMENTAL PROGRAMS - ENVIRONMENTAL AFFAIRS

TO: MANAGER, OPERATIONS - ENVIRONMENTAL CONSERVATION

SUBJECT: EPA ISSUES FINAL EFFLUENT LIMITATION GUIDELINES FOR INORGANIC CHEMICALS INCLUDING CHLOR-ALKALI PLANTS

The U.S. EPA promulgated effluent guidelines for inorganic chemicals manufacturing including chlor-alkali plants on June 29, 1982. The chlor-alkali subcategory is the only one of direct interest to Shell amongst the ten subcategories for which guidelines were finalized in this rulemaking. The rulemaking includes revised BPT* guidelines, BAT** guidelines, and New Source Performance Standards (NSPS). BCT*** guidelines were not issued at this time because EPA has not finalized a methodology for the appropriate cost tests.

The numerical guidelines have been abstracted and are shown in Table I. The BPT guidelines limit total suspended solids, total copper, lead and nickel, as well as pH. The BAT guidelines limit total copper, lead, nickel, and total residual chlorine, as well as pH. The NSPS guidelines limit total suspended solids, total lead, total residual chlorine, and pH. The BPT and NSPS guidelines were significantly relaxed from the existing guidelines, see Table II. Apparently, the model effluent flow for this process has been found by the EPA to be much greater than the original premises, and the guidelines were so changed to reflect this. For more detail, the pertinent Federal Register pages are attached.

The technology basis for the copper, lead, and nickel BAT guidelines includes equalization, alkaline precipitation, settling, and dual media filtration. Dechlorination is the technology basis for the chlorine BAT guideline. The BAT guidelines reflect a 30-day average limit of 270 ppb for lead and a max day limit of about 670 ppb. Back calculated concentration limits for all four regulated toxic pollutants are shown in Table III. Other toxic pollutants found in the effluents from this process were antimony, arsenic, cadmium, chromium, silver, and asbestos. All but asbestos were exempted because they will be effectively controlled by the technologies upon which the BAT guidelines were issued. Asbestos was excluded from regulation at this time because no standardized analytical method exists for measuring it.

Promulgation of these guidelines as final could affect the second-round NPDES permit for DPMC-Chemical. By some readings of the consolidated

DPMC-15185

LAM 013919

EPA Issues Final Effluent
Limitation Guidelines for Chlor-Alkali Plants

2

permit regulations, it would be mandatory for the EPA to establish permit limits for toxic pollutants for which BAT guidelines have been issued; even though the guidelines are for one process in an integrated complex. Limits could be in the form of mass limits, concentration limits, or a monitoring requirement. Such limits could be on the final discharge or on an internal stream. It would be appropriate to review the data on copper, lead, nickel, and residual chlorine at DPMC-Chemical and be prepared with a negotiating position if limits are proposed by Region VI on these parameters.

If there are questions on the details of these regulations, please contact J. N. Brewster of this department.



R. W. Fourie

JNB:bas

Attachments

cc: -Superintendent Environmental Conservation - Deer Park Manufacturing
Complex

-W. D. Loveless

THIS COPY FOR

*Best Practicable Technology
**Best Available Technology
***Best Conventional Technology

LAM 013920

DPMC-15186

FEDERAL
Guidelines
1982

EPA-WATER
811.5.6

LAM 013918