To: W. L. McClain/M. G. Hayes

From: R. Bryan
Date: October 26, 1984

Interoffice Communication

Subject: COOLING WATER BLOWDOWN REROUTE LEGALITIES

VISTA

As you're aware, we're evaluating a project to remove cooling water blowdown from the VCM Plant wastewater system. This would allow direct discharge of this clean water and through hydraulic reduction possibly enable the VCM system to meet anticipated NPDES constraints. This direct discharge is done by routing the blowdown through an existing line to the VCM 001 outfall. This existing line currently carries incinerator wastewater to the VCM 101 outfall box, from which the water is pumped to the LCCP north lagoon. The project would send the wastewater to the north lagoon via tie-in to an existing sanitary sewer. This tie-in raises a number of environmental and technical questions. The portion which needs your resolution is the legal/environmental ramifications of introducing a process wastewater stream into a sanitary sewer. For perspective, if the various questions can be answered satisfactorily, we want to pursue the project in the above manner; there are no easy alternatives.

The sewer line currently carries sanitary sewage and liquid materials from the VCM Plant lab to the north lagoon. The line is a vitrified clay, bell-and-spigot design. Characteristics of the incinerator water stream are: 1) flow is 25-30 gpm, 2) pH is controlled at 6.0-6.5 by caustic addition, 3) contains virtually no hydrocarbons (water is from absorbers which are after incineration), 4) contains about 3000 ppm chlorides and 5) contains about 100 ppm solids, primarily calcium and magnesium carbonates.

Would you please consider the environmental and legal ramifications of the project. If there are no serious concerns, we will then resolve remaining technical questions with the Ethylene Plant (the line goes through the unit) and other groups.

R. Bryan

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cc: RTF, RAC, PEM, PDC, DLD, PLF, JCL