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on 85-40100
Strum - [unclear] [unclear]
[unclear]

March 18, 1987

Ms. Susan Ford
Burson-Marsteller
1850 M Street, N.W.
Suite 900
Washington, D.C. 20036

PLAINTIFF'S
EXHIBIT
1009

Dear Susan:

I apologize for the delay in getting these clippings to you. Also enclosed is a draft general purpose response to the most recent event - EPA's decision to fully comply with Ms. Carol Van Strum's Freedom of Information Act request for the information generated to date on the joint five-mill study.

EPA has agreed to the following:

- to characterize the information as meaningless, used only to establish testing procedures.
- to respond with a letter to Ms. Van Strum today, but to ship the material on April 1.
- to meet with us to discuss the public affairs strategy on this and how subsequent requests for information will be handled.

Per Wayne's good counsel, neither API nor any of the companies involved attempted to block this information release via legal remedies.

Please let me know if you have additional needs.

Sincerely yours,

Carol L. Raulston
Vice President
Government Affairs

CLR/jrl
Enclosures
cc: Wayne Pines
Burson Marsteller

PILOT FILTER PERFORMANCE

TEAM INFORMATION

Dave Busby	technical resource
Kerry Kendrot	research engineer
Wendy Smades	supervisor of research
Kay Smith	research engineer
Peggy Wolff	supervisor of research
Technical Solutions Team	technical resources

REASONS FOR IMPLEMENTATION/IMPROVEMENT

MISSION

To remove solids from the outfall water and thereby remove dioxins/furans. (The Technical Solutions Team experiments have shown that dioxins/furans adhere to solid particles.)

OPPORTUNITIES

1. Remove dioxins/furans from process water.
2. Send cleaner water back to the Brazos River .
3. In so doing, improving Dow's environmental technology.

PROBLEM STATEMENT

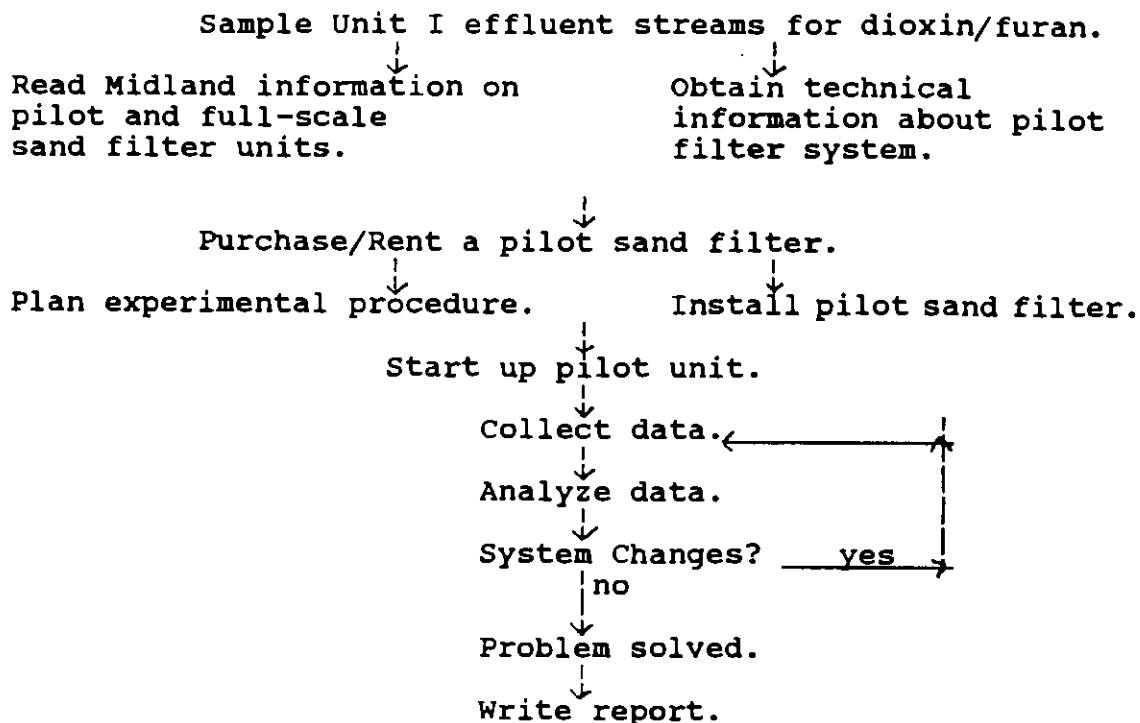
The dioxin/furan concentration in fish increased in the Brazos River in 1990. One of the major contributors was the Oyster Creek Unit I site.

OT 306384

NOT SUMMARIZED
- LOOK to see
if important
- J6Z thinks
probably not

CURRENT SITUATION

FLOWCHART



MEASUREMENTS

Analyze feed and filtrate samples for total suspended solids (TSS), toxicity equivalent concentration (TEC), and particle size distribution (PSD) for two months.

GOAL

Remove 90% of TSS from effluent water.

ANALYSIS

PROBABLE CAUSES/BARRIERS

2. "Mud balls" caused by solids build-up on filter media.
3. Poor solids removal - too low a concentration of flocculent, too high a TSS in feed, channeling in media bed, change in feed particle size.

COLLECT AND EVALUATE DATA

Gather data on feed conditions of flowrate, pH, temperature, flocculent concentration, TSS, PSD, and TEC.

DEVISE AND IMPLEMENT

Check TSS in and out to see if there is 90% removal of the solids.

SOLUTION

If less than 90% removal, change a condition on the pilot filter - flocculent concentration, on-line run time, or lower feed flux rate.

Changing conditions on the pilot filter did not keep removal of solids at 90%. Reevaluate 90% solids removal as a valid condition.

SOLUTION

Use a standard of less than 5-6 ppm TSS on the filtrate.

MONITOR AND CONFIRM

Continue to operate pilot filter and collect data to verify results.

STANDARDIZE AND CELEBRATE

By removing TSS out of Oyster Creek effluent, 98-99% removal of the furans present was achieved.

FOR the mtg

For the test Can we do fewer isomers
 Do the 3 outfalls for all 17 isomers
 Do only the few isomers of greatest interest

Takes 6 months to ~~set up~~ train on basics [After Hoechst]
 2 yrs before data available + Trust worthy
 Must have PHD Mass Spec. person

Break project out into HEX.
 Then, project down

Urgent need do the 3 outfalls and ^{a set of} ~~some~~ fish in the Brazos. Then we will need to address the other outfalls sources etc. **But**, we will need more time.

Qualified Dioxin expert at Texas A & M, Steve Safe

Non-biodegradables would limit capacity of new WWTP.

* Spending Plan

1992	-	\$ 300
1993	-	4500
1994	-	700
Total	-	5500

* Recommendations

Consensus was that this project should be supported and included in the 1993 Environmental Master for Texas Operations.

ENVIRONMENTAL MITIGATION

* Presentor - Ed Ambs

* Auth - 33971

* Plant - Texas Operations

* Scope

Compliance with TWC requirements and current permit for dioxins and furans.

* Driving Force

Current permit and regulatory compliance

* Comments

Requirements for this project are constantly changing as new data are received and solutions tried. Current spending plans are reflected below.

* Spending Plan

1992	-	\$1778
1993	-	1800
1994	-	600
Total	-	4178

SUMMARY OF 1993 ENVIRONMENTAL MASTER PROPOSED SPENDING PLAN

AUTH.	TITLE	TOTAL	1992	1993	1994
33977	Epoxy Environmental Upgrade	2335	250	935	1150
33853	Vent Abatement System	1200	100	400	700
33894	Process Tank Vent Destruct	2600	330	850	1420
33924	RCRA Tank/Rnwatr Seg Unit 3	SPENDING ON HOLD			
33896	Plant B/OCD Pipeline	5500	1000	4000	500
33828	Versene Chlorinolysis Unit	5500	300	4500	700
33971	Env. Mitigation Projects	13000	1778	1800	600
TOTALS		32561	3758	12485	5070

MISCELLANEOUS COMMENTS

1. Kent Kerr and Donna Hicks gave a short presentation on plans underway within Texas Operations to comply with the 50% reduction goals for emissions. Three major product groups represent 60%

ENVIRONMENTAL MITIGATION PROJECTS

- * NO. 13
- * Presentor - Dave Jones
- * Plant - Texas Operations
- * Auth. #33971
- * Scope - Compliance with TWC requirements and current permit for dioxins.
- * 50% SARA/3350 - NO
- * Emission Reduction - ?
- * Driving Force - TWC Permit
- * Spending (\$MM) - Range of \$7.0 MM to \$17.0 MM depending on how various parts work.

1992	\$ 4.0 MM
1993	\$ 7.0 MM
1994	\$ 2.0 MM
- * \$/Ton Reduction Cost - ?
- * ROI - (-16%)
- * Comments
Know by April if scrubber cooling will be required. If not required, could save \$8 - 10 MM in cost. Money in most cases will have to be authorized without Phase 3 cost estimate being done.
- * Recommendations
Must follow with present program for compliance.
- * Comments/Recommendations 3/25 Review
Continue with plans to fund from the 1993 Env. Master. Will know more at the May review if scrubber cooling will be required.

STYRENE 2 CC-8 REFRIGERATION REPLACEMENT

- * NO. 14
- * Presentor - Ernie Mueller
- * Plant - Styrene 2
- * Auth. #33967
- * Scope - Replace 20 year old reciprocating compressor using R-12 refrigerant with new wet-screw compressors using HFC-134a refrigerant.
- * 50% SARA/3350 - R-12
- * Emission Reduction - 18.1 tons/year R-12
- * Driving Force - 1995 deadline for R-12 elimination.
- * Spending (\$MM) - \$2.1 MM Total

1992	\$.24 MM
1993	\$ 1.32 MM
1994	\$.54 MM
- * \$/Ton Reduction Cost - \$116,000
- * ROI - ?
- * Comments
Is 1995 still a good year for elimination of R-12. We have a lot of refrigeration systems across the division that need to be addressed and should we not have a champion for all of them to coordinate activities. Early estimates indicate we may have a \$60 - 80 MM project across division. Charlie Golden is working on issue for Chlor-Alkali and I do not believe they are on the same 1995 compliance schedule.
- * Recommendations
Delay at least one year. Suggest looking at champion to address all the divisions refrigeration needs for replacement and set up priority system.
- * Comments/Recommendations 3/25 Review
Project not reviewed. This project will be consolidated into the overall master plan to address these compounds. Funding will not

BRAINSTORM QUESTIONS

HOW SHOULD THE PUBLIC BE INFORMED OF THE STUDY? WHAT INFORMATION GIVEN? WHEN?

WHAT IS THE LATEST INFORMATION FROM THE CDC ON NOEL, FISH CONSUMPTION LEVELS, DRINKING WATER, ETC.?

2/6/90
CHJ.12.54

OT 307601

REPORTED LEVELS OF "DIOXIN" IN AREA WATERS
 FROM HOUSTON CHRONICLE THURS. SEPT. 20, 1990

ALL CONCENTRATIONS IN PARTS PER TRILLION

	SHIP CHANNEL	GALVESTON BAY	NECHES RIVER	BRAZOS RIVER
SEA CATFISH (FILETS)	14.96			
CROAKER	1.19			37.5
BLUE CRAB (MEAT+ORGAN)	64.6			
BLUE CRAB (MEAT ONLY)	3.53	6.23		
OYSTERS	7.69 8.72	4.8 2.6		
BLUE CATFISH	3.2			
REDFISH	0.66	ND 0.041		
SPOTTED GAR			9.1	
LARGEMOUTH BASS			5.13	
BLACK DRUM				13.56 15.6