PCB - Manuf

Monsanto

FROM (NAME & LOCATION) J. R. Savage - General Office

DATE October 8, 1971

CC H. S. Bergen
P. B. Hodges

SUBJECT SEPTEMBER 1971 PCB REPORT

REFERENCE

TO : W. B. Papageorge
General Offices

A. W. G. Krummrich Plant

I. PCB Level In Sewers

Aroclor sewer loss control data are attached. There is a difference between the measured plant exit losses and the amount analyzed at the treatment plant. Whereas the plant exit losses continue to indicate a reduction (50% lower in September compared with August), the treatment plant influent samples contain 5 times more PCB, and September losses equal those of August. Additional sampling is in progress to better define the magnitude and source of PCB losses.

A. Aroclor Department - The average daily loss from the department measured 0.2#/day. An additional sampler was installed in the sewer box adjacent to the department. Intent was to pick up material from bottom of box in attempt to detect slug flows from the department. A visual check was made on daily basis at intervals in September. No PCB's were ever detected.

B. Total Plant - September daily losses through the 26th averaged 6#/day. This is about 50% of last month's level and the lowest yet recorded for a month. However, losses measured into the treatment plant are several times the amount leaving the WGK Plant. Grab samples and additional sampling with a different type pump would indicate that measured losses at the plant exit 24" and 30" sewers are in error. This discrepancy must be resolved.

All sewer boxes in the 24" sewer from the department to the plant exit were agitated with air. Purpose was to move any PCB's that may have settled along the sewer route.

C. Treatment Plant Effluent - September (through 29th) averaged at 17#/day; 30% greater than last month.

PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 34

CONFIDENTIAL 92-CV-204-WDS

CER 015616

IN 10 REV 11-65

HARTOLDMON0007279

W. G. Krummrich Plant (Contd)

II. Project Status=

Estimate No.

2095 "Aroclor Scrap Rework" - To permit rework of returned material. 95+% complete. EDC extended to 11/1/71.

2422 "Paving and Curbing" - To contain losses in tank car and storage area in Dept. 246. Curbing and pads complete. Major sewer to be installed to North. EDC extended to 11/1/71.

2482 "Contaminant Collection at Rip Track" - To permit better control of tank car washings and drawings. 25% complete. EDC extended to 11/1/71.

2675 "Air Pollution Control" - Provide nitrogen blanket on mix tanks and redirect chlorinator rupture disc lines to reduce atmospheric pollution in Dept. 246. Design package issued for nitrogen blanket. Hold rupture disc lines in abeyance because of possible safety problem.

3102 "Enlarge Aroclor Settling Basin" - To permit containment of possible losses in the operating department. EDC - not yet scheduled.

III. Program Status

Continue to take routine samples and review on daily basis.

At present, we do not know source of possible PCB loss and we do not have a PCB material balance on the sewer system. Must define.

Will define altered program required to approach plant goal of 1#/day maximum.

B. ANNISTON PLANT

I. Current level - Aroclor losses during September averaged 0.56#/day (71 ppb).

II. Projects

Three of the four departments using Therminol FR-2 (Aroclor 1248) will be changed out week of October 4 to a non-PCB type of Therminol. Santowax and Solid Aroclor system will use a new product called OM-16. HB-40 will use Therminol 66. Changeout will occur in October 1971.

The P_2S_5 Department will use Therminol 66 and will be changed out during the Niran turnaround in January 1972.

III. Spills - There were no Aroclor spills during the month of September 1971.

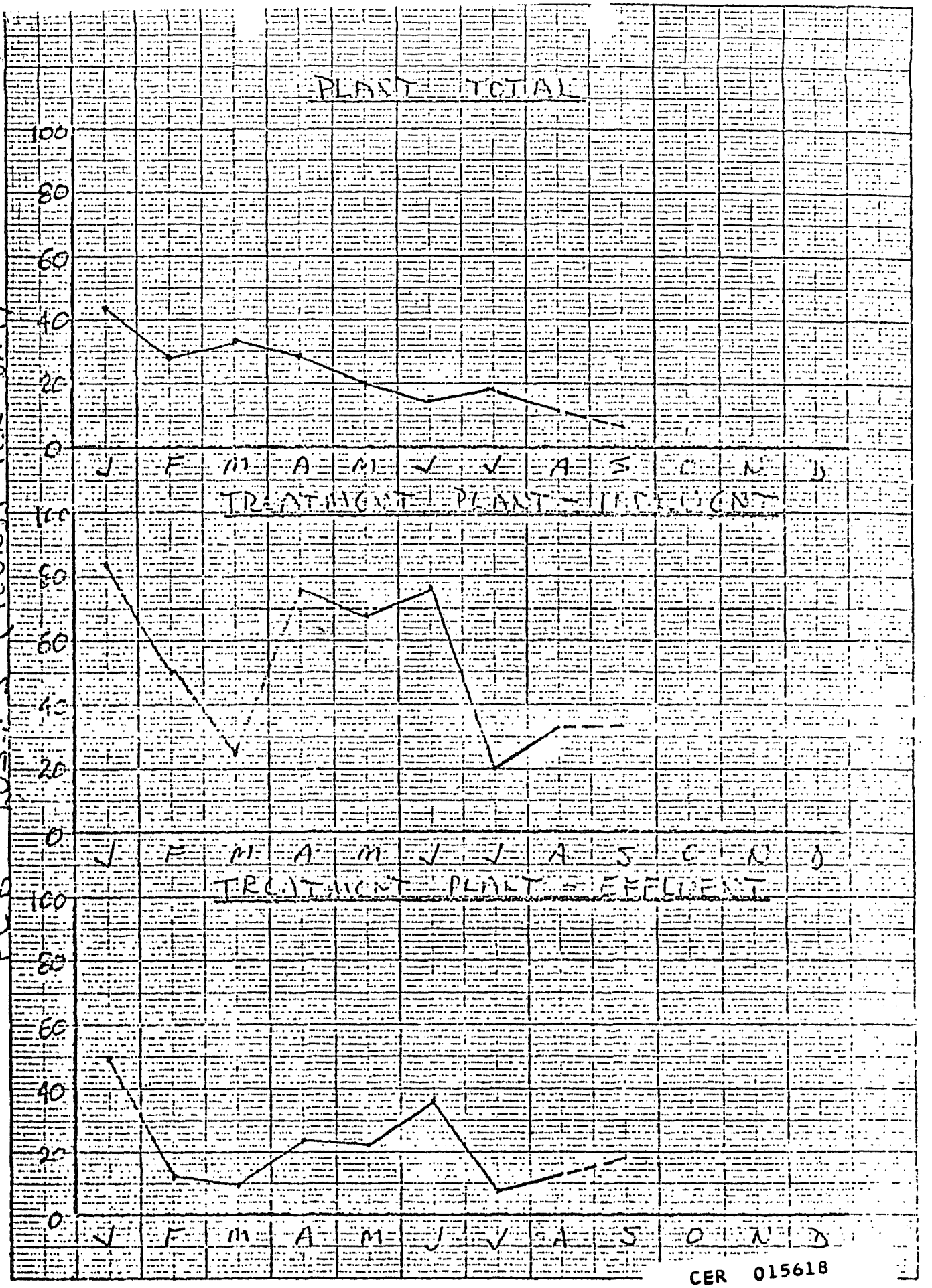
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J. R. Savage

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CER 015617

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20 X 20 TO THE INCH 46 1220
7 X 10 INCHES
KEUFFEL & ESSER CO.

CER 015618

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