

FROM (NAME & LOCATION) W. G. Krummrich Plant

DATE : March 4, 1969

SUBJECT : AROCLORS AND POLLUTION

REFERENCE :

cc: G. L. Bratsch
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B. R. Williams
P. B. Hodges - G.O.
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TO :

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Recently there has been an outburst in the West Coast press about the toxic effects of Aroclors in San Francisco Bay and other bodies of water. Aroclor appears to be similar to DDT in that it is absorbed by fish and other aquatic fauna and accumulated in the tissue. Further concentration is said to occur in birds or mammals feeding on the fish. There are few details available and the reports could be exaggerated. However, sufficient publicity has been given to the problem to cause us some problems. We, therefore, need a plan to combat its effect on this plant.

What we propose is:

1. Sample sewers, outfall, upstream and downstream river water and sludge from river and treatment plant, to evaluate the problem. (A method is presently being developed at South Second Street.)
2. Discontinue sewerage spent Aroclors within the plant.
3. Carefully check operation for possible accidental losses to sewer.
 - a) Leaks in heat exchange systems.
 - b) Manufacturing operations.
 - c) HCl off-gas - drowning or scrubbing.

We believe that the use of Aroclor is confined to Depts. 238, 243, 245, 246, 258, 270, 273 and 275, and that there is a possibility of carry-over to 217 in the HCl off-gas.

Will you please consider your operations for other possibilities and take appropriate action to prevent any further loss to sewer? Do we ever drain Aroclor from transformers?

We will furnish analytical results when available.

CONFIDENTIAL 92-CV-204-WDS

Clarrie Buckley

CER 011109

Clarrie Buckley
Technical Services Department

PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 18

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