BCC: P. G. BENIGNUS
D. A. OLSON

July 7, 1970

Mr. Robert Cochran
Manufacturing Manager
Sangamo Electric Company
Pickens, South Carolina

Dear Bob:

During my visit to your plant on June 25th, I promised to comment on my observations made during the tour of your plant and to summarize my suggestions regarding the disposal of polychlorinated biphenyls.

In general, I was favorably impressed with the concern for pollution which was expressed by all of your personnel. The recent installation of waste water treatment facilities is strong evidence of your desire to comply with your state pollution regulations.

A major step toward reducing disposal problems, as you know, is achieved when contamination, leakage, spillage and the like are under tight control. This is possible with properly engineered equipment which is well maintained and with management insisting on a high standard of housekeeping.

From my quick tour of your facilities, I would judge that your biggest problems are due to the mixing of waste water with Aroclors. Every effort should be made to isolate the two, otherwise subsequent separation can become costly.

The discharge of exhausts to the atmosphere is also a large source of environmental contamination. Tank vents should be interconnected to minimize free breathing. The ventilation system should be adequately sized to keep the Aroclor concentration in all working areas below 0.5 to 1.0 milligram per cubic meter. The discharge from this system should be cooled to condense the Aroclor vapors and entrainment separators should be utilized to prevent droplets from being discharged.

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Liquid wastes must be destroyed by incineration at temperatures exceeding 800°C. Burning at lower temperatures merely vaporizes the Aroclor into the atmosphere or, worse yet, could result in materials which are highly toxic. Any customer, not having access to a properly designed incinerator, may choose to return liquid waste to Monsanto's W. G. Krummrich Plant, Sauget, Illinois, Attention: Supervisor Department 246. Monsanto will store this material until an incinerator scheduled for completion later this year is in operation. The tentative charge for this service is 3¢ per pound of returned material. This does not include freight or container costs and will be reviewed when firm incinerator costs are determined.

Solid wastes which include rags, absorbants, failed capacitors, treatment clays and used containers present a more difficult challenge. Until a unit is designed to properly incinerate this type of waste we are suggesting the use of authorized, properly operated land fills not located near any water systems.

I am certain that with your Management's interest and concern in minimizing the escape of PCB's to the environment, you will succeed in achieving your objective. We must all succeed and in so doing will, hopefully, prevent any regulatory agency from being compelled to take precipitous action resulting in the banning the use of PCB's.

Sincerely,

W. B. Papageorge
Manager
Environmental Control

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cc: G. R. Graham

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