Monsanto

FROM (NAME & LOCATION): E. E. Stewart, W. G. Krummrich Plant

DATE: August 28, 1974 CC:

SUBJECT: PCB CONTROL

REFERENCE:

TO: Mr. Bill Engman
Mr. Art Leley

Our present goals and timing with regard to PCB control in 1974 are as follows:

Department losses Dept. 246 Incinerator	<1#/day
Other plant losses	0#/day
EDC	1/1/75

You are essentially on target for control of department losses. I do not know status of "other plant losses" exclusive of background.

Paul Heisler will issue a status memo related to the overall PCB plans as outlined in the memo Heisler/Bratsch, 2/26/74.

As I mentioned before, we at WGK will probably be subject to visits from our customers and the EPA. Although we are below 1#/day known losses, we may be able to improve a little bit more. Perhaps a renewed departmental program to further control losses will not only permit a further reduction, it will also better prepare the department for any surprise visits from our customers on the EPA.

I can think of a few items in no particular order of importance.

1. Be sure all pumps (except water) have drip pans under them and drain pipe to container.

2. Upgrade containers for collecting leaks from drip pans, drain spots, sampling lines, etc. Some containers are colored and discolored plastic, buckets, coffee cans, etc. If they were all uniform it would look better.

3. You may want to copy ideas from the attached "Pyranol Handling Instructions." I do not know the degree to which the instructions were followed, but I obtained this at G.E.'s Pittsfield plant.

4. Extra effort by maintenance and department to repair steam and condensate leaks. (We have been telling our customers how "bone dry" we are able to keep our facilities.)

5. Upgrade sampling station. Box needs painted or replaced. Chart is dated 7/25. Get instruments measuring and recording what they were designed to do.

6. Review again with all operators the reasons for and why we must contain and control PCB's within the department. This is especially true if you have new operators. All operators should have correct answers and attitude if questioned by visitors.

   Any "gimmick" you can think of to get the operators more involved and concerned will be of value. A SPOT THE LOSS CONTEST, or TAG THE LEAK or etc., etc., etc.

7. Does the PCB detector instrument in the north settling basin function properly so as to alarm in the event of a major spill in this area?

8. Are the off-gas valves on the 236 high line functioning properly to prevent drowning 246 off-gas at 236? Are proper instrument signals being recorded in 246 control room from 236 high line?

9. Large tank west of #1 mix tank looks like it either overflowed slightly, or there is a slight drip at tank vent or gage board opening. In any event, PCB's should be wiped from side of tank. The ground area would indicate there was no loss to the sewer, but the tank straight side looks unsightly and could detract from all the good effort that has been put forth to contain and control departmental losses.

10. Gary Johnson, Virgil Brawley and Tom Carrico can probably think of many other ways to improve just a little bit more.

These are my thoughts. Will assist wherever you need help.

E. E. Stewart

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