Monsanto

FROM (NAME & LOCATION) W. C. Engman - WGK

COMPANY CONFIDENTIAL

DATE February 2, 1971

SUBJECT STATUS OF PROGRAM FOR AROCLOR POLLUTION CONTROL

REFERENCE

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This is the February 1, 1971 status of the PCB pollution control program.

I. PCB Levels in Sewer:

A. Aroclor losses from the Aroclor Department averaged about 0.6 lbs/day with a high of about 1.1 lbs/day.

10 PPD = 200 #/day

Losses from the treatment plant for the period 12/17-1/15 averaged 22 lbs/day (114 ppb). Range for 6 samples was 2 to 53 lbs/day (9-278 ppb).

B. Data gathering on Aroclor in the various plant sewers is in progress. Samples are being composited twice weekly for analysis.

II. Projects to Reduce Sewered PCB's from Aroclor Department

A. Design package for Estimate 2422 to pave and trench loading and storage areas was completed and issued in January.

III. Programs to Eliminate Sewered PCB's from Using Departments

A. Therminol system in ONA (Dept. 222) was changed to Therminol 66 during the month.

B. Completion of design packages for 13 additional units is scheduled for 2/15/71. Changeout of all units is targeted for completion by 6/1/71.

C. Several alternates including use of a eutectic salt are being evaluated for the Dept. 245 (P_2S_5) therminol unit. Evaluation is scheduled to be completed by 4/1/71.

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D. Decision on what hydraulic fluid to use to replace the PCB Pydraul in Dept. 251 will be made by 3/1/71.

E. In order to reduce the risk of PCB's being sewered from washing Aroclor trailers at Rogers Terminal, all Rogers trailers containing PCB's will be washed at WGK's Rip Track.

IV. Reach 10 ppb in the Treatment Plant Effluent

At this time, it appears probable that PCB losses to the sewer can be controlled at less than 2 lbs/day (equivalent to 10 ppb at the treatment plant) by 9/1/71. This will be accomplished by:

1. Continuing current control of losses from Dept. 246.
2. Changeout of all therminol units to non-PCB fluids.
3. Installation of pads and catch basin at the loading and storage areas in the Aroclor department.
4. Installation of a catch basin at the Rip Track.

Losses at the treatment plant are expected to remain above 10 ppb by 9/1/71 due to past sewer contamination. Projects to clean sewers could run several hundred thousand dollars. A preliminary estimate to clean the sewer from the Chlorine department to the plant fence was $70,000 and another $70,000 would be required to clean from the fence to the treatment plant.

Both main plant sewers appear contaminated with PCB's (30W and 24W). Our plan is to continue monitoring the main sewers to determine extent of losses and loss dissipation rate. By 6/1/71, when essentially all therminol units have been changedout, we should be able to extrapolate to when the PCB level should reach 10 ppb at the treatment plant without sewer cleaning. Based on this information, we should decide promptly on whether or not sewer cleaning is justified.

V. PCB Levels in the Atmosphere

Estimate 2675 for $6,000 expense was approved to replace the nitrogen purge with a nitrogen blanket at the mix tanks. Project package is scheduled for completion by 3/15/71.

VI. PCB Rework Project (Est. 2095)

Project package was issued in January.

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