PROHIBITION OF USE OF AROCLOR OR OTHER FLUIDS CONTAINING PCB AT WGK

Because polychlorinated biphenyl compounds (PCB) persist in the environment, it is the policy of the W. G. Krummrich Plant not to use Aroclor, or any other fluid containing PCB, for any purpose within the plant other than as a coolant in electrical transformers. The manufacture of Aroclor in Department 246 will continue. It is recognized that the manufacturing process has a greater potential for loss than exists in the areas where Aroclor is used as a heat transfer medium or as a hydraulic fluid.

However, we are in the process of protecting the entire manufacturing area by sumps, etc,, and, ultimately, all the waste water from the department will be treated to remove PCB down to our goal of 10 ppb. In addition, air pollution control devices are being installed to prevent loss to atmosphere.

If Aroclor were to be used for any purpose at WGK outside the Aroclor manufacturing area, the same stringent precautions to prevent loss, coupled with treatment of air and water waste streams, would be necessary to avoid exceeding the plant goal. It is believed that its use in electrical transformers within the plant is acceptable and that losses can be adequately controlled from the minor amount of handling involved. However, use as a heat transfer fluid involves a much wider area and many more items of equipment, thus complete protection by sumps and treatment of all waste streams leaving the department would be required for each department using it. Even with this control, the total loss of PCB from the Krummrich

PROHIBITION OF USE OF AROCLOR OR OTHER FLUIDS CONTAINING PCB AT WGK (continued)

Plant would be increased for each additional use. Adequate removal of PCB at the waste treatment plant is prohibitively expensive because of the volume of waste involved and, furthermore, the technology has not been fully developed.

Because it is the sole manufacturer of Aroclor in the U.S.A., the W.G.K. Plant must completely control loss during manufacture and cannot afford the risk of adding to this loss by permitting other than transformer use within the plant boundary.

The manufacture of the more persistent PCBs by Monsanto is being discontinued which means that, with stringent control, the amounts remaining in the environment may eventually diminish. However, no PCB (1242 for example) may be considered to be biodegradable in the sense that most organic wastes are biodegradable. 1242 is merely a little less persistent than the more highly chlorinated products.

Therefore, the W.G.K. Plant has decided to ban the use of PCBs in the plant outside Department 246, except for transformers. Alternates must be found for all present uses of fluids containing PCB.

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