Monsanto **CONFIDENTIAL**

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

DATE: October 31, 1972

SUBJECT: STATUS - PCB
POLLUTION CONTROL PROGRAM

REFERENCE:

TO : Mr. J. R. Savage
General Offices
B2SL

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This is the November 1, 1972 status of PCB pollution control program.

I. PCB LEVEL IN SEWERS

"Knowing PCB losses" from the operating department and the incinerator area in October at 1.9 #/day were more than double last month's losses. Waste Treatment Plant Effluent and Influent losses of 3 #/day and 8 #/day respectively were the same as last month. "Knowing losses" and Waste Treatment Plant Effluent losses are within the expected EPA guideline if the eventual standard will be based on concentration of PCB in the receiving water at 0.01 ppb.

Aroclor sewer loss control data are attached.

A. Aroclor Department - "Knowing PCB losses from the department increased from 0.55 to 1.76 #/day during the month. This increase is due to the intermittent sewering of off-gas at the Aroclor department when excess gas is available. It has not been possible to completely coordinate production between the Aroclor and Chlorosulfonic Acid departments when Aroclor is the sole supplier of gas at low chlorosulfonic acid production rates. This condition will be reviewed to determine methods of correction. Also continued air blowing during the month, and a premise for long range correction must be developed. Did not do in October.

B. Incinerator - Measured losses decreased to 0.11 #/day. The incinerator was in operation all month. Losses during month are significantly lower than previous months. Ultimate goal from this area is 0.05 #/day.

I. PCB LEVEL IN SEWERS (Cont'd)

C. Total Plant - Influent of 8 #/day is the same as last month. Would expect possible reduction of an additional 1-2 #/day and the rest attributable to background. Background losses up to 5 #/day will probably decrease slowly with time.

D. Treatment Plant Effluent - October losses at 3 #/day are the same as last month. This loss is equivalent to about 0.003 ppb in the Mississippi River.

II. PROJECT STATUS

Project 3972 - "Reroute North Basin Sewer" - To reroute effluent from department North Settling Basin such that all sewer flow from the department will flow from one point. EDC - 12/15/72

Project 3956 - "Alterations to HCl Distribution System" to eliminate possibility of sewering Dept. 246 HCl gas. EDC 12/15/72. (This project to be reviewed based on latest mode of operation where 246 is sole supplier of gas to 217).

III. PROGRAM STATUS Re Engman/Bratsch 4/24/72

1. HCl Off-Gas

A. Aroclor - Attempting to coordinate production with operations in the C/S department, but there have been instances of automatic sewering of off-gas. Because of reduced C/S requirements, the Aroclor department has become the sole supplier of gas, and it has not been possible to completely coordinate production so as not to sewer any gas. This condition is being reviewed to determine methods of correction.

B. Awaiting approval of estimate "Install PCB Off-Gas Scrubber" $73,000 Capital, $4000 expense.

2. Blow Tank Off-Gas

Resumed air blowing 8/14. Premise for longer range correction not completed in October. To be done in November.

III. PROGRAM STATUS...(Cont'd)

3. Aroclor Department Catch Basin

Project 3972 EDC at 12/15/72 (See write-up under "Project Status")

Project to be prepared in 4th quarter to permit either filtration or carbon treatment of overflow from south basin to permit reduction of losses to essentially zero.

4. Incinerator Scrubber

No work planned.

5. Incinerator Catch Basin

Project to be prepared in 4th quarter to permit either filtration or carbon treatment of overflow to permit reduction of losses to essentially zero.

6. Rip Track Washes

Future work required (filtration, carbon treatment, etc.) to get PCB content in wash water down to desired 0.01 #/wash.

WGK STRATEGY

An "in hand" status report was prepared for the Federal Authorities in the event we are asked what we have done, are doing and will do at WGK to control PCB's from the environment.

Plant strategy review meeting held 10/20/72. Minutes published on 10/26/72. No plan to contact EPA until PCB is declared a toxic substance and standards are to be prepared with regard to water quality.

Edward E. Stewart
Technical Services Department

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