JOE D. TANNER
Commissioner

J. LEONARD LEDBETTER
Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

December 29, 1976

MEMORANDUM

TO: W. M. Jernigan

FROM: T. M. Miller

RE: General Electric Company
Rome - Floyd County

On December 10, 1976, a meeting to discuss the draft permit recently sent to General Electric was held in this office with the following:

M. Phillips	-	General Electric
R. Lester	-	General Electric
B. R. Williams	-	General Electric
O. C. Woods	-	Georgia EPD
W. M. Jernigan	-	Georgia EPD
T. M. Miller	-	Georgia EPD

G. E. was concerned over the requirement for daily PCB analyses. It was confirmed that daily means seven days a week even though they normally operate at full capacity only five days a week. The seven could be changed to five if the results show no irratic results on the weekends with the reduced plant operations.

They presented the following comments on each discharge:

Discharge 002

The main contamination is probably from personnel tracking it in the plant. All manufacturing wastewater will be diverted to the spray pond by January 31, 1977. After this they estimate the PCB concentration will be 10 ppb average for any wet weather runoff.

Discharge 004

The storm sewer piping between the oil house and the boiler room and eventually to the spray pond will be repiped to overhead to eliminate any possible infiltration in the oil house area. A septic tank will be used as the pump sump. Over the Christmas shutdown the spray pond will be cleaned. After the above is accomplished, they estimate the average PCB concentration will be 8 ppb and 10 ppb during dry weather and storm runoff conditions.

1776
1976

Discharge 003

Any areas adjacent to waste pyranol tank and sound lab found to be contaminated will be paved to prevent leaching. A shed will be built over the drum storage area. The welding gun cooling water will be diverted to the sanitary sewer to eliminate any dry weather flow. The above will be completed by February 28, 1977. After February 28, they estimate the average PCB concentration in the runoff will be 20 ppb.

Discharge 001

Soil borings were taken throughout the adjacent 15 acres at varying depths up to a maximum of five feet. It will take until March 31, 1977, to interpret soil sampling data.

Sanitary Discharge

The pipe from the oil house will be blocked and repiped overhead to prevent any infiltration. All clothing of workers in PCB containing areas will be covered by aprons and rain suits. The aprons and rain suits will be disposed of as a solid waste when soiled. Employees working with PCB will be required to clean their hands with waterless cleaner and wiped on rags, which are disposed of as solid waste.

Occasionally a transformer is overfilled with pyranol in the main plant. The spillage is collected but the outside has been washed into the sanitary sewer. In the future the transformer will be placed over a drip pan. The spill will be washed off with solvent into the drip pan. The drip pan will be cleaned with fuller's earth and rags.

They estimate the concentration of PCB in the sanitary sewer outfall after July 1, 1977 will be 15 ppb. Present plans for composite sampling of the sanitary sewer is for time proportioned collection until April 1, 1977, when a flow proportioned sample will be collected along with a flow reading.

Other comments on the draft permit were as follows:

P.10,B. Other Conditions, #3 - They would like to change the report on July 1, 1977, to a status report and the first annual report on technology to be due December 1, 1977.

P.10,B. Other Conditions, #4 - The equipment for measuring intensity and time for rainfall will not be delivered until April. In the interim the total daily rainfall will be measured.

P.11,C. Schedule of Compliance, #1,e. They do not feel this can be attained by July 1, 1977 for 001, 003 and 004.

P.11,C. Schedule of Compliance, #1,i. Clarification of what this might require was requested and discussed.

G. E. requested at least an additional 30 days for submitting monitoring reports for a total of 45 from end of reporting period. A 15 day extension was indicated as being the maximum we could allow.

The appeal process was explained.

TMM:bk
cc: City of Rome file