J.R. Savage - General Office

October 7, 1970

Mr. H.S. Bergen
Mr. P.B. Hodges

SEPTEMBER PCB REPORT

Manufacturing

Mr. W. B. Papageorge
General Office

ANNISTON PLANT

PCB Levels In Snow Creek

Average PCB loss for the month was high at 2600 ppb or 32 lbs/day, largely as a result of one very bad day (400 lbs) Contributing causes were:

1. The old limestone pit was overloaded and solid sludges were carried through,

2. Detergent cleaning of the department,

3. Sewering of excessive amounts of muriatic acid.

Since the new limestone bed was placed in service on September 23, pit effluent has been at 0-3 ppb PCB's. However, leaching of PCB's from the creek bed results in a plant effluent level of 90 - 240ppb or 1.1 - 2.8 lbs/day, gradually declining. The plant believes that the new pit can handle ordinary upsets and peak loads.

Regulatory Action

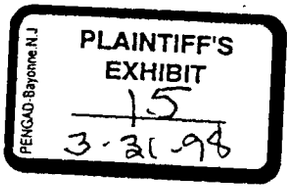
Telephone contact continued with the Alabama Water Improvement Commission. However, a planned meeting did not take place due to illness of AWIC members. Pressure for routine submission of analytical data is not intense at this time.

Department Suspended Aroclor Control

An experimental skimmer operated very well removing the PCB laden scum which accumulates in the new sump.

Solid Wastes

Solid waste data for evaluation of disposal methods has been accumulated. A report will be issued in October.



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W. G. KRUMMRICH PLANT

PCB Levels In Sewer

Current losses to the river from the treatment plant range from 12 to 742 ppb with an average loss of 311 ppb for 11 samples. This is an equivalent average loss of 71.5 lbs/day.

Projects To Reduce Sewered PCB's From Aroclor Department.

Blow Tank Demister (Estimate 2031) project construction is underway with completion scheduled for October. A Process Amendment was approved.

Project for about $30,000 to provide paving, curbs, trenches and catch basin in tank car and tank truck loading areas will be added to the incineration project to speed approval.

Program To Eliminate Sewered PCB's From Using Departments

Departments 243 and 244

Plans are to replace the Therminol FR-1 with Therminol 55. Lab work has been conducted to verify that there is no reaction between Therminol 55 and any process materials. Engineering is underway on system modifications required for use of Therminol 55. Target date for changeover is 12/1/70.

Department 245

The major problem here is air pollution from the supply tank vent. Our target is to scope a solution and prepare an estimate by 11/1. Changeover to a different fluid is undesirable in this department due to the high fire potential.

Department 251

No work has yet been done on the lubrication and hydraulic type systems in this department.

Department 239

Work is in progress to develop project premise. We expect to eliminate two pumps and a cooler in the Therminol lines. (Pending results of thermal stability of Santophen 1 residue). The project will include a new expansion tank with submerged

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W. G. KRUMMRICH PLANT

Department 239 (Cont'd)

pump. We also plan to upgrade controls and make furnace operation more reliable. How to sump the area around potential spills is still unresolved. To go to a flammable heat transfer fluid is considered too great a process safety hazard in this area.

Department 255

Plans are to replace FR-2 with Therminol 66 by 11/15/70.

Department 248

No progress has been made to date. A definite plan will be developed by 11/1/70 with the objective of solving any problems by 1/1/71.

Department 258 (DDS)

The unit is still down and most likely will not be started up again. The material on the pad has been removed.

Department 270

A 55-gallon drum has been placed under the vent. Chat soaked with Aroclor around the furnace must still be replaced.

Department 275

A 55-gallon drum must still be placed under the vent line (the vent will have to be shortened to do this). Chat around the furnace still needs to be replaced.

Department 273

Work completed. Drum placed under surge tank vent. Buckets placed to collect material from drip pans under Therminol circulating pumps.

Department 222

Unit in start-up. No visible source of loss observed.

Estimate 2292 will be revised. This is the project to provide 150,000 gallons of storage for scrap Aroclor. A plant level earnings expense estimate will be prepared

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W. G. KRUMRICH PLANT

Department 222 (Cont'd)

to cover the cost of altering the storage tanks. The 4,000 gallon trailer originally used to haul Aroclors to Queeny Plant will be used for scrap Aroclor hauling in the plant.

PCB Levels In Atmosphere

Vapor losses from the Aroclor Department are estimated at 2.3 #/day now and 1.6#/day after the installation of the blow tank demister.

1. Scrubber Stack (from blow tank drowning jet) 0.90#/day

   This is a measured quantity. With installation of the demister and closing the batch blow tanks, air flow should be decreased to about 20% of present flow. Assuming the concentration to be the same, loss would be reduced to ~0.2#/day.

2. Fume Removal Stack (from drowning area and sampling stations) 0.05#/day

   This is an estimated quantity based on most vapors coming from the drumming station and assuming 10,000,000 #/year drummed, and 1242 vapor pressure at 80°C. Samples are being taken to verify.

3. Aroclor Transfers Within Department 1.34#/day

   This is an estimated quantity assuming 70M #/year production and 2.5 transfers/pound at 100°C. Samples will be taken at storage vents to verify.

4. Steam Jets - unknown

   Will be measured.

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