PROPOSED PCB REGULATIONS June 20, 1977

A review of the proposed PCB regulations prepared by Versar shows that our current PCB incinerator could be modified to meet these regulations. The incinerator destruction efficiency is adequate so no process revisions would be required. However, especially in the areas of monitoring and record keeping, significant modifications are required. A summary of these items of concern follows.

1) Continuous monitoring of exhaust gasses for O_2, CO, CO_2 - We currently monitor only O_2.
2) Weekly monitoring of exhaust gasses for NO_x, total hydrocarbons, chlorinated organics, O_2, CO, CO_2, HCl - while we have periodically sampled for these items, we do not have manpower or adequate sampling facilities for a weekly sampling frequency.
3) Rate and quantity of PCB's fed to the combustion system to be recorded every 15 minutes - this takes better flow measurements, integraters and recorders.
4) Shut down on failure of any of the monitors in items 1 and 3 above - this would require extensive backup systems to maintain a reasonable on stream times.
5) Special labeling of PCB containers - this would require labeling of tanks and equipment at the incinerator.
6) Curbing must be 6" high - we have some curbing that is 4" tall and our curbs must also be raised to meet required diked capacity.
7) Recording of storage of PCB's held for over 48 hours - drums could present a record keeping problem as the storage is to be recorded by location, date received and source.
8) All of these records are to be kept available for inspection for 3 years. This paper shuffling will take storage and manpower.

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9) Another environmental operating permit will be required.

To resolve these problems would take, by ballpark guess, $100,000 capital and over a year for design and installation.

Some other possible impacts on the plant are:

1) Sewage treatment sludges containing 0.05% PCB's must be incinerated. We do not expect the Sauget treatment facility to exceed this limit, but Mr. R. L. Harness will have the sludge sampled to be sure.
2) Decontamination of containers requires a triple rinsing with a PCB solvent. Our current decontamination plans will not use this solvent rinsing.
3) The 400,000 gallon tank "Little Mo" currently used for PCB waste storage must either be diked or not used for PCB storage.
4) There is no suitable plant disposal procedure for PCB light ballasts, etc. Messrs. F. Basile and B. Birk will prepare and implement a plan to meet these regulation.
5) The landfill regulations should not apply to our landfill, but leachate from this landfill would be in violation if the regulations were applied.

No action other than checking the waste treatment plant sludge and developing a program for light ballast disposal is planned to meet these regulations. We anticipate having both the PCB producing and incinerating departments shutdown prior to the proposed 1/1/78 enactment date.

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