

3/21

FROM (NAME & LOCATION)

P. E. Heisler - W. G. Krummrich Plant

DATE

February 26, 1974

cc:

A. E. Leisy
D. C. Otto
G. A. Hippe
W. C. Engman
E. E. Stewart
C. F. Buckley
G. L. Johnson
H. J. Horner
W. B. Papageorge - B1ND
D. B. Hosmer - E1SF
P. B. Hodges - E1SF
J. R. Savage - B2SL

SUBJECT

PROPOSED PCB PLAN

REFERENCE

E.E. Stewart's "Proposed PCB Standard" of 2/21/74

TO

G. L. Bratsch

After the PCB meeting of Thursday, February 21, we met with Production, TSD, Laboratory and others involved and established the following primary responsibility assignments and time table for the actions discussed. We will keep all concerned current on our progress in the regular monthly status report, the "PCB Environmental Control Program". Also, we will advise on the approximate total cost and specific dollar cost for each item as soon as these data are developed.

A) General Items Developed at the 2/21/74 Meeting

Responsibility

Time

1) Air Monitoring

a) Review Incineration Monitoring and Report

Buckley

3/15/74

b) Develop Program for Monitoring air emissions from Dept. 246

Buckley with consultation with Production & TSD

3/15/74

2) Disposal of Aroclor Drums

a) Visit Evans and decide if change is necessary

Heisler/Leisy

2/26/74

b) Develop alternate methods

TSD

4/1/74

3) Determine PCB residual levels at Anniston Plant

a) Develop Plan

Stewart

3/1/74

b) Measure

Stewart

4/1/74

4) Sewer Sampling Program to establish a "PCB Balance"

a) Develop a plan

Buckley

4/1/74

b) Implement and establish balance

Buckley

5/1/74

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G. L. Bratsch
Proposed PCB Plan

Pg. 2
 2/26/74
 WGK

A) General Items Developed
 at the 2/21/74 Meeting (continued)

- 5) Communication and Educational Program (similar to "Mercury effort").

Responsibility Timing

Otto 4/1/74

3/14

B) Items to attain Goal I
 (Department losses < 1# day)

WGK Plant 1/1/75

- 1) Upgrade sump at Incinerator area to better recover PCB's that collect in the 10,000 gallon sump.

TSD (open)

- 2) Expand existing drum pad and provide additional curbs in Incinerator Area.

TSD (open)

\$20M D C
 6/1 11/1

- 3) Start and demonstrate off-gas scrubber in Aroclor Department.

TSD/Prod. ✓ 2/27/74

- 4) Eliminate aeration step in the continuous process in Aroclor Dept. Project being installed at present.

TSD/Prod. 3/8/74

Nothing T/D
 noamt. Complete not done

- 5) Improve sampling pick-up and facilities at Incinerator area.

Buckley/TSD (open)

\$8M D C
 6/1 11/1

- 6) Monitor cooling water systems in Aroclor Department to discover equipment failure with possible resultant discharge of PCB to department effluent streams.

Buckley/Prod. 4/1/74

Nothing T/D
 3/14/74

- 7) Develop statistical data analysis technique to better spot out-of-control condition in Aroclor and Incinerator area.

Gloeckner 5/1/74

C) Items to attain Goal II
 (Other Plant Losses - 0# day)

WGK Plant 4th Quarter 1975

- 1) Institute a procedure to control handling of returned drums to eliminate losses within the plant.

Johnson 4/1/74

\$50M

- 2) Discontinue tank car and tank trailer washing operations at Repair Track area.

Prod./TSD (open - as soon as possible)

D C
 5/1 11/1

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C) <u>Items to attain Goal II (continued)</u> (Other Plant Losses - 0# day)	<u>Responsibility</u>	<u>Timing</u>
3) Continue present housekeeping practices in department and throughout the plant with regard to containment of PCB's.	Johnson	3/15/74
4) Determine effect of PCB's that are presently sulfonated in the chlorosulfonic acid scrubber.	Horner	7/1/74
5) Develop statistical data analysis technique to better detect loss trends and assist in definition of "background" losses.	Gloeckner	5/1/74
6) Continue the HCl off-gas header control to virtually eliminate possibility of inadvertently sewerage gas at Dept. 236.	Leisy	4/1/74
D) <u>Items to attain Goal III</u> (Losses to River - <1# day)		
1) Background losses must be identified.	Buckley	8/1/74
2) Laboratory experiments must be performed to predict the expected reduction in PCB's that will be possible in the soon-to-be installed Chemical Treatment Plant at the Sauget Waste Treatment Plant.	Horner	10/1/74
3) Develop and implement required additional actions. a. Clean sewers b. Repair and replace portions of plant sewer system where necessary. c. Remove contaminated chat and soil throughout the plant where necessary.	Leisy/Heisler/ TSD	As necessary

Please advise if there are any comments or questions.

/ghw

PCWA
P. E. Heisler

DSW 329954

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PCB Sampling

Objectives

1. Monitor known sources - 246, Incinerator, Rip Track
2. Pinpoint significant sources other than above.
3. Establish background level if any.
4. Minimize consumption of Hexane.

Plan

1. By 4/1/74 the five existing flip-flop samplers will be located:

- a. Dept. 246
- b. Sewer Box 3E
- c. Incinerator
- d. Sewer Box 3R
- e. 236 Scrubber

(EDC for relocation is 3/22/74 but one sampler must be borrowed for use at Anniston.)

2. TSD will design a flow measurement and sampling point to be located above grade level at the incinerator. Water from the settling basin at the incinerator will be pumped into this system and all other discharges from the area will be plugged off, (except the sanitary sewer).

Until this system is complete we will use a flip-flop sampler at 2G.

3. We will continue to sample from the drum at the WTP Influent and Effluent.
4. Analysis will be minimized to conserve Hexane.
 - a. The samples to be analyzed routinely (2 per week) will be.
 - i. Dept. 246
 - ii. Incinerator
 - iii. 3E (covering Depts. 236 and 217)
 - iv. Influent
 - v. Effluent

DSW 329955

may
b) 2 samples per week from 3R (217) and 236 will be analyzed until ~~Mid April~~. After which they will only be analyzed if 3E should indicate a problem. Sampling at 217 will be correlated with CS Scrubber operation.

c) Use of the alternate test (UV absorption) on daily samples from 246 will be evaluated.

UV for Dept.
(5) As soon as parts are available 2 additional samplers will be assembled. These will be used to check 'background' losses on a sequential basis and that improvements in control are reflected in the trunk sewers. Check points will be: 1B, 2A, 4G, 4R, 1-C-1, 4E-4, 2-B-1, ~~3~~P, 4K, 239 217, 5A

6 Incinerator

11/11/74
A 24 hr. test for chlorine and HCl is in progress to complete our permit requirements for start-up and end of quarter, after which a 2 hr 'EPA' type test will be made for PCB and particulates. EDC 3/22/74. If the problem of unidentified material persists, we will set up an extraction/collection system to obtain a larger sample of the material.

7 Atmospheric Emissions (other than the incinerator)

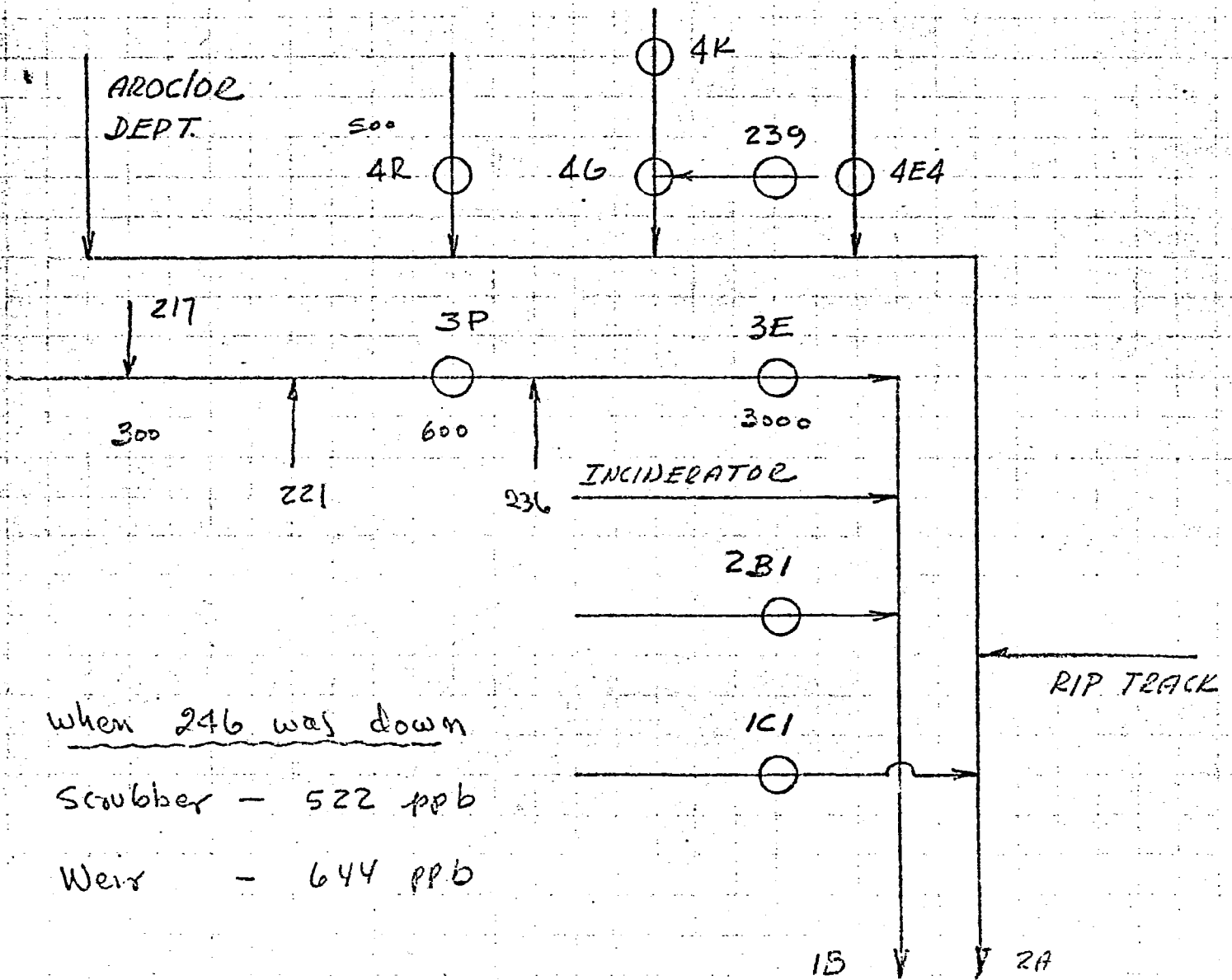
Work in this area will begin on 4/1/74. Initial tests will be made with midget impingers using iso octane as the absorbent and UV absorption as the method of analysis. The Scrubber exhaust and the refining still vacuum jets will be the initial sources.

DSW 329956

BACKGROUND PCB

#/day

TE	4R	46	4E4	3E	2B1	1C1	3P	4K	239	21
2-1	.06	.17	.02	2.00	.01	.02				
2-5	.06	.34	.02	2.95	—	.01				
2-12	.06	.08	—	4.14	—	—	.50	.10	.02	
2-20	—	—	—	1.08	—	—	.21	—	—	.10



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