Memo to

FROM (NAME & LOCATION) W. A. Krull, M. A. Pierle, Krummrich

DATE August 3, 1970

SUBJECT Arochlor Air Pollution Control

REFERENCE

TO : Mr. W. B. Papageorge
General Offices

cc W. R. Richard G. O.
J. R. Savage G.O.
P. B. Hodges G.O.
F. McDonald Newport
H. L. Williams Anniston
D. W. Jackson
B. W. Corlew
C. F. Buckley
R. M. McCutchen
B. Young
W. C. Engman
A. L. Rasmussen

As a first step, all points of potential Arochlor air emission were identified. These are summarized in the attached list. Observations made at the time of inspection are included.

The plant pollution group has received equipment which should enable us to quantify this amount of Arochlor being lost to the atmosphere from all points where a flow is occurring. Sources like Therminol vent lines that are only breathing will be sampled, but data will be more qualitative than quantitative. Sampling will also be done at various plant locations to determine whether or not there is a detectable amount outside using or producing areas. Sampling will begin in August. Level of air losses will be determined and a reduction program laid out by the end of the month. Obvious problem areas such as the Therminol furnaces in Departments 239, 245, 248 and 255 will receive immediate attention.

W. A. Krull

M. A. Pierle

/gjs

attachment

PENGAD-Bayonne, N.J.
EXHIBIT
Pierle 2
JWB 6.8.98

TOWOLDMON0047495

The following are points of Aroclor vapor losses within Dept. 246.

Source	Estimated Loss
1. Drowning jet stack	0.1#/day
2. Fume removal stack	Unknown
3. Vacuum jets (6)	Unknown
4. Therminol furnace	Unknown
5. Storage tanks (9)	0.5#/day
6. Tank car loading (2)	0.25#/day
7. Trailer loading (1)	0.25#/day
8. Finished product tanks (4)	< 0.1#/day
9. Blend tanks (2)	< 0.1#/day
10. Surge tanks (2)	< 0.1#/day
11. #6, #7, #8 chlorinator sampling points	Unknown
12. Mix tanks (3)	0.25#/day
13. Intermediate storage tank	0.1#/day

TOWOLDMON0047496

The following are potential sources of Aroclor atmospheric emissions from non-Aroclor producing departments at W.G.K.

Source	Remarks
1. Dept. 222 cooling system vent.	Low probability due to low operating temp.
2. Dept. 222 heating vent.	System not yet in operation.
3. Dept. 248 cooling system vent on surge tank.	Low prob. due to low temp. No noticeable odors or fumes upon inspection.
4. Dept. 248 heating system vent on surge tank.	Material leaking from vent to 55 gal. drum. Odors present in area.
5. Dept. 239 surge tank vent.	Heavy fumes and odors readily noticeable in area.
6. Dept. 245 surge tank vent.	Fuming heavily from corroded vent. Material visible on concrete and chat around unit. Odors in immediate area.
7. Dept. 273 surge tank vent.	Vent is rigid pipe to sewer. System not operating at time of inspection.
8. Dept. 270 surge tank vent.	Vent discharge to chat. Visible signs of material on chat beneath vent. No odors or fumes at inspection.
9. Dept. 243 tank vents. System used for chlorinator cooling.	Vents are covered with loosely fitting caps. No noticeable fumes or odors.
10. Dept. 244 pump tank vents.	Fumes and odors present during use and transfers.
11. Dept. 275 surge tank vent.	Vents to collection bucket at ground. No fumes, odors, or material noticeable at unit.
12. Dept. 258 surge tank vent.	Tank vents to room on third floor in operating dept. Unit used only during DDS production.
13. Dept. 255 surge tank vent.	Vents to either 8" sewer pipe or to air considerable fuming due to 300°C temperature.

MONS 099041

TOWOLDMON0047497