January 23, 1969

AROCLORS IN PLANT EFFLUENT

TO: Messrs.
E. G. Wright - ANNISTON
C. F. Buckley - KRUMMRICH

cc: Messrs.
W. R. Richard - WRICH
W. A. Kuhn - WKUHN
D. B. Hosmer - DHOSM
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C-O-N-F-I-D-E-N-T-I-A-L

With the likelihood that the attention now being focused on presence of aroclors in natural waters will draw attention to any aroclor being sewered in our production plant outfalls, we should begin to protect ourselves. Since the problem, if any, has not yet been defined, I'm recommending at this time only action preparatory to actual clean up. Please arrange for the following:

1. Waste samples -- Before any clean up action of any kind is taken, we need to know, at least approximately, how much aroclor we are discharging into natural waters via our waste outfalls.

   We do not presently have techniques for analyzing water for aroclors in low concentrations. It is expected that these techniques will be developed by late this coming fall. Therefore, please collect, freeze and hold indefinitely three 2-3 liter samples of your outfall as it is discharged to natural surface waters (entrance to Snow Creek at Anniston; outlet of Village waste treatment plant at W. G. Krummrich). Scott Tucker, who is developing the analytical procedures suggests use of polyethylene bottles. Samples should be taken several days apart and should represent normal conditions, including one sample taken at peak loading (e.g. after dropping spent aroclor from P_2S_5 heat exchanger at W. G. Krummrich).

2. In addition to collecting the samples, commence collecting data on points and amounts of aroclor discharges to sewers and means of disposal alternate to sewering. This information will help permit us to move rapidly in case a crisis develops. Do not proceed with abatement projects at this time except as in (3) below. Publish report on information developed along with roughly estimated costs. June 1, 1969, appears to be a reasonable deadline at this time for the report, but this could change drastically.

PLAINTIFF'S EXHIBIT 6016 5-21-98 PENGAD Bayonne, N.J.

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