Monsanto

FROM (NAME & LOCATION) A. E. Leisy - W. G. Krummrich Plant

DATE : May 26, 1976

CC: R. W. Flint
C. Paton - B2SK

SUBJECT : PCB DISCUSSION - 5/25/76

REFERENCE :

TO : R. A. Pohl
B2SB

The discussion held with you, Cumming Paton, and David Wood pointed to certain decisions the W.G.K. Plant felt were needed in the near future. These were:

1. The desirability (need) to set a "cease manufacturing" date.

2. The need to relate this date to cut-off of customer scrap PCB's for incineration at WGK.

3. The need to set a date past which we would stop inventorying PCB's and make "on order" for the customer.

A. E. Leisy

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Attachment: Background data reviewed in 5/25/76 discussion.

emz

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IN - 10 REV. 1/72

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DISCUSSION WITH R. A. POHL - 5/25/76

A. Possibility of supplying total Aroclor requirements from England and closing W.G.K. (Do not make 1016 there.)

B. E.P.A. request for meeting and limits they propose:

1. 1 ppb is probably not feasible. Can measure at 10 ppb in sewers but not much less with current procedure.

2. Cost to attempt capital in excess of $1.6 $\bar{M}$.

3. Timing probably 1 - 1-1/2 years after request approval.

4. Research work will be needed on carbon treatment before design starts.

5. Losses to air, however minimal, must be resolved. Added money to $1.6 $\bar{M}$ listed.

6. Decision on what is minimum production to trigger shutdown.

7. System needed to insure we don't get stuck with inventory (produce on order?, etc.).

C. Incinerator

1. Must make decision on when to stop taking scrap pcb.

2. Must raise price to make profit until "1".

3. Plan to burn all PCB now in stock by August, 1976 if we can get fix on 246 and returns. This will allow better use of incinerator for plant and further economies.

D. Reasons why I would rather give E.P.A. shutdown date:

1. Keep them out of plant and have early end possible to reporting. We do not report at all now.

2. Reduce possibilities of long term work and expenditures due to background levels if we once start reporting.

3. Costs for treating 4500-5000 gallons per minute from plant by carbon separations would be staggering. Both capital and operating.

Generally, other sewers are $<$10 ppb which is our detection limit with current method. New method will be needed to check lower limit.

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A. E. L.

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