Monsanto

FROM (NAME & LOCATION) P. E. Stewart

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SUBJECT PCB - EIA "AD HOC COMMITTEE"

REFERENCE

cc W. C. Engman - WGK
C. Paton - B2SC
W. R. Richard - T3A
J. R. Savage - B2SL
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TO : Mr. W. B. Papageorge
General Offices
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On my visits to 15 capacitor manufacturing plants, the three most prevelant questions or comments were:

1. What information or procedures can you give that will help in handling a PCB spill outside the manufacturers plant?

2. What information is available related to clean-up of effluent streams via filtration and/or adsorption and what are rough costs?

3. Are we concerned about atmospheric losses via venting and exhaust systems?

Therefore, I believe procedures should be developed, information should be developed and concern should be answered related to the above. Monsanto should provide the required assistance to either the EIA or to the customer in the three areas to:

1. Develop procedures or guidelines that can be followed in the event of a spill. We should know what must be done and by whom. To my knowledge this procedure has not been developed. We all have ideas and each case can be different, but more thinking must be distilled into defined guidelines and procedures -- I can visualize "spill squads" trained and strategically available in areas throughout the country where potential spills or accidents are most likely to occur. They would know what to do, where equipment could be obtained, how to contain and correct and how to placate press and public. This group may well be EIA sponsored and not Monsanto or specific customer related.

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2. Need to develop enough design data to be able to know what rough installation and operating costs will be required to filter and/or adsorb PCB's from effluent streams. Must relate to flow quantity and PCB level in and out. Should relate to carbon, foam and other possible adsorption and filtration media.

3. All should have rough idea as to how much PCB's may be discharged to the atmosphere from vents, exhaust systems, vacuum system discharges, etc. Can be determined by field measurement and/or calculations. Specific procedures for measurement and/or calculations have to be developed and made uniform. After problem is defined, possible corrective actions will have to be evaluated.

In addition there are other areas the EIA may want to consider for recommendation to the respective plants.

1. Uniform sampling, flow measurement and analytical procedures where possible.

   a. All are familiar with our sampling techniques.

   b. All should know flow quantities or should determine flow (lithium chloride technique can be used.)

   c. Customer laboratory methods or purchased laboratory services and Monsanto methods should be the same. (Incidently, PCB effluent analysis is expensive; about $60/sample.)

2. All plants to be thoroughly familiar with their discharge streams to know how their stream and eventual point of discharge into a body of water will be defined with regard to calculating allowable discharge.

3. All plants to implement housekeeping, educational and personal protective programs as related to PCB control and containment.

4. All plants to pay particular attention to transfer of PCB's from tank cars to tank trucks where such transfers are necessary for subsequent unloading at plant site. Specific procedures can be developed as guidelines. Also, unloading at plant site whether from tank cars or tank trucks must be controlled to prevent any loss of PCB. [Monsanto may choose to discontinue selling PCB to customers where spill control is not effective at unloading site.]

5. Disposition of solid and liquid wastes must be in accordance with approved landfill procedures. Landfill procedures must be clarified and/or defined so all can act uniformly to insure required waste control.

6. Of course, control and containment is a must as well as the elimination of as many effluent streams as possible from all processing areas.

E. E. Stewart

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