Monsanto

COMPANY CONFIDENTIAL

FROM (NAME & LOCATION): E. E. Stewart, Krummrich

DATE: July 27, 1972

SUBJECT: POLYCHLORINATED BIPHENYLS AND THE ENVIRONMENT

REFERENCE:

TO: Mr. Paul Heisler
Director of Environmental Control at WGK

cc: G. L. Bratsch
W. C. Engman
G. A. Hippe
P. B. Hodges - G.O. (E1SF)
A. E. Leisy
W. B. Papageorge - G.O. (B2NA)
J. R. Savage - G.O. (B2SL)

During the past three years, varied actions have been implemented at the W.G. Krummrich manufacturing facilities to restrict and reduce Polychlorinated Biphenyls (PCB) entrance into the environment.

Major activities can be summarized as follows. More details related to the specified areas are attached.

I. The total production of Aroclors at the W.G.K. Plant reached a peak in 1970 and has since decreased by 16%.

II. Production of the higher chlorinated homologues, (Aroclor 1248 and above) has decreased about 60% since 1969.

III. Manufacturing facilities were installed to produce a more biodegradable homologue in the chlorinated biphenyl series, Aroclor 1016. Expect about 60% of the 1972 total production to be Aroclor 1016. ($970,000)

IV. Container alterations made (heavier metal drums).

V. Product labeling changes to reflect possibilities of environmental contaminant, restrictions for use of therminol and opportunities for waste disposal by incineration.

VI. Installation of facilities to permit reworking and/or incinerating PCB's returned from the customer as a means of waste disposal. ($790,000)

VII. Restricted usage within the plant outside of the manufacturing department to electrical equipment that contains Aroclor as an integral fluid contained within the respective piece of equipment. ($80,000)

IN - 10 REV. 1/72

VIII. Equipment modifications and installations were made to restrict, contain and monitor knowing losses of PCB's to the lowest technical achievable level within the manufacturing department. ($170,000)

IX. An educational program is being directed to the operating personnel related to good housekeeping and the need for care to control and contain Aroclor wastes in the manufacturing areas.

Needless to say, such activities as listed above to control and contain PCB losses, require a dynamic action control program. Many people are involved from the operators, first line supervision and superintendents at the operating level to the technicians, chemists and engineers in the laboratory, environmental control and engineering departments.

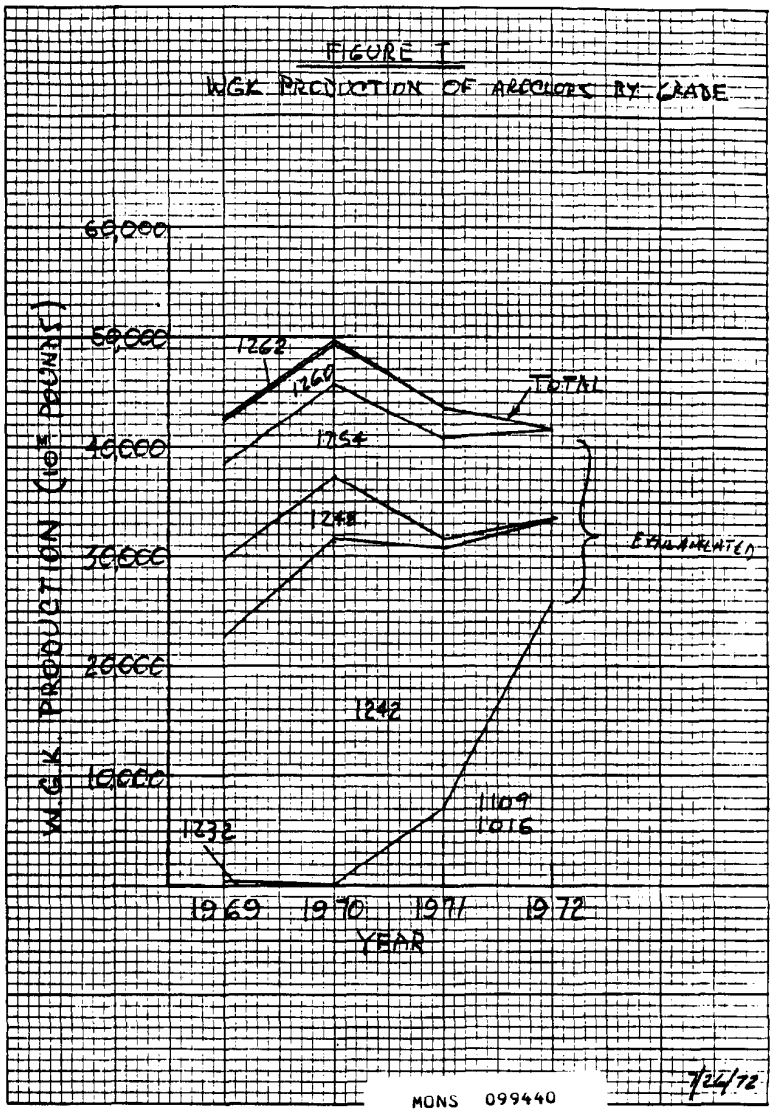
y Laboratory equipment methods - Cost?

Edward E. Stewart
Technical Services Department

/tm
attachments

FIGURE 1

WGK PRODUCTION OF AROCLORS BY GRADE



7/24/72

MONS 099440

K-E 10 X 10 TO THE INCH 46 0782
7 X 10 INCHES
KEUFFEL & ESSER CO.

CONTAINER ALTERATIONS MADE

During this period a heavier metal drum was substituted for a lighter weight drum. The metal thickness was increased by 26% when the 18 gage drums were replaced with 16 gage drums. Both side walls and heads were increased in thickness. Double chimes are provided on the heads for added strength.

The heavier gage drum affords more protection against possible leakage due to damage in handling and transporting.

LABELING CHANGES

The following additions were added to various labels:

"This product contains polychlorinated biphenyls, which some studies have shown may be persistent, air environmental contaminant and, possibly, injurious to certain forms of bird, aquatic and animal life. Extreme care should be taken to prevent any entry into the environment through spills, leakage, use, disposal, vaporization or otherwise."

"WASTE DISPOSAL Used polychlorinated biphenyl fluids may be returned freight prepaid for proper incineration at 3¢ per pound. Ship to: Supervisor, Dept. A-246, MONSANTO COMPANY, SAUGET, ILLINOIS 62201"

"ATTENTION - DO NOT USE IN ANY SYSTEM INVOLVING PROCESSING OR HANDLING OF: Food or food related products; Food wrapping or container materials; Pharmaceuticals or animal feed stuff. ANY CONTACT MAY CONTAMINATE THESE ITEMS TO THE EXTENT THEY MUST BE DESTROYED."

"IN CASE OF LEAK OR SPILL, CALL COLLECT 618-271-5835."

INSTALLATION OF FACILITIES TO PERMIT REWORKING AND/OR INCINERATING PCB's RETURNED FROM THE CUSTOMER

Equipment was installed to permit the incineration of liquid waste Aroclors. Complete incineration of the liquid waste is affected by incineration at 2000°F. Facilities are available for handling waste Aroclors from tank cars, tank trucks and drums.

Effluent streams from the disposal facilities are closely monitored to assure that knowing losses are controlled.

Incinerator, permit reviewed by Ill EPA meets standards

monitored routinely

EQUIPMENT MODIFICATIONS AND INSTALLATIONS WITHIN THE MANUFACTURING DEPARTMENT FROM 1969 TO 1972

Numerous projects were completed to eliminate atmospheric discharges, to eliminate discharges to the sewer and to contain PCB's within the manufacturing department that may have resulted from accidental spills or equipment failures.

A. Atmospheric vents and rupture disc lines were rerouted through catch tanks and/or redirected to settling basin areas.

B. Nitrogen blanketing provided on storage tanks.

C. Mist eliminators installed in gas lines.

D. Settling basins were installed in sewer system.

E. Areas were paved, curbed and sewer trenches directed flow to settling basins.

F. Underground sewers were mounted above ground or repaired to eliminate build-up and cross flows of underground PCB contaminated waters.

G. Sewer sampling facilities and flow instrumentation provided.

In addition all Therminol heating units in the plant were converted to non-PCB type fluids.

During this period laboratory equipment was purchased and plant expertise was developed to analyze streams for PCB's in the ppb range.