Monsanto

FROM (NAME & LOCATION) W. L. Smull - Krummrich Plant

DATE January 11, 1977

SUBJECT WASTE INCINERATION - WGK

REFERENCE

TO R. W. Flint

cc

R. E. Bilger	- E3NA	Plant Mgr's. Staff
J. E. Bishop	- B2SL	TSD Staff
H. C. Carder	- E1SF	P. E. Heisler
C. Downing	- E3NA	K. E. Boucher
P. W. Edwards	- B2SL	
W. A. Kuhn	- E1SA	
M. A. Pierle	- E1SA	
R. A. Pohl	- B2SB	
J. E. Smith	- B3NA	
J. F. Thompson	- E1SF	E.E. Hendrikse-B2NA
R. M. Kountz	- F4WA	R.S. Nelson - B3NJ

The "Aroclor" incinerator was originally installed for the specific purpose of destroying Aroclor bearing wastes. It currently serves that purpose, plus other plant wastes are incinerated in it to utilize excess capacity. The facility is capitalized as a plant service facility with a $747 K Gross Asset Value and a $340 K Net Asset Value as of 12/31/76.

In late 1977 shutdown of the Aroclor Department will eliminate internally generated Aroclor wastes and in early 1980 startup of the new rotary kiln incinerator will occur. This unit will provide waste disposal capability at WGK for all known and projected incineratable wastes, none of which require the high temperature capability of the existing incinerator.

Thus, prior to completion of shutdown and decontamination of the Aroclor unit, the position of the business group toward disposal of customer Aroclor wastes after we cease Aroclor production needs to be reconfirmed. Their previous position has been that they will not do so but will refer customers to contract incinerators on the basis of lower cost to the customer and no liability to Monsanto. A new factor favoring this position is that the pending Sauget NPDES permit contains a clause relating to requiring monitoring and, if necessary, pretreatment of the Monsanto effluent for PCB's which may be avoided if no PCB operations exist at Krummrich. If the business group wishes to retain Aroclor incineration capability at WGK, it should include the provision that they assume the capital and operating costs of the incinerator as well as any environmental monitoring and treatment costs related to maintaining this facility.

If the Aroclor group is not interested in the facility and another group has a need for a facility capable of high temperature incineration, it should be offered to them on the same basis.

DSW 355820

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Assuming no one is interested in the facility for dedicated service we should evaluate the "out-of-pocket" economics of converting this unit to incineration during 1978-1979 of selected St. Louis area wastes versus contract incineration costs. Ken Boucher has been requested to make this cost analysis as well as prepare preliminary retirement and dismantling cost information. Operation and retention of this facility after startup of the rotary kiln incinerator appears not to be feasible unless a viable specific need for high temperature incineration is identified.

To simplify in-plant communication, technical responsibility for all WGK incineration facilities is being given to L. W. Sprandel, Zone A.

W. L. Smull

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