I. GENERAL ENFORCEMENT TRENDS

A. Water Pollution

With Congress deeply involved in other problems, comparatively little attention was given to pollution. There was little evidence of real pressure from the Nixon administration to speed up pollution control or to increase federal financing of control projects. David Dominick (a young lawyer-politician with no background in pollution control) was appointed Commissioner of the Federal Water Pollution Control Administration (FWPCA). A proposed Water Quality Improvement Act of 1969 is being kicked around but appears to be mostly concerned with oil spill clean-up. The 7% Investment Tax Credit for control facilities will be out and may be replaced with a 3- or 5-year write-off provision.

Carl Klein, Assistant Secretary of Interior, declared his policy intention to halt new enforcement actions and, rather, to rely on informal progress review sessions. He was promptly squelched by a number of organizations and had to back off.

Only real activity affecting us is the FWPCA pressure on Iowa to set early dates for secondary treatment along the Mississippi and Missouri Rivers. Iowa is refusing to do this. As part of the scheme to bring Iowa into line and to speed up secondary treatment on the Mississippi, Missouri was forced to hold a hearing on June 13 for moving forward the date of 1982 for secondary treatment in the Saint Louis area. No report has been forthcoming from the hearing, but we expect the date to be moved to 1975 or 1976. Early secondary treatment will cost the Organic Division about $1 - 1.5 M extra annually for the two Saint Louis area plants.

B. Air Pollution

Little new activity. The federal regional program is moving deliberately. Guidelines were issued for setting the required air quality standards and the accompanying timetables.

The Illinois Air Pollution Control Board, in deep political trouble, was given a last-minute reprieve by the new Governor in the closing hours of the Illinois Legislature and is still in existence with reasonably adequate funds. The reprieve was coupled with a warning to "shape up" public relations-wise. Accordingly, the Board is in process of adopting extremely stringent air quality standards and unrealistically tight timetables for the Chicago and

WATER_PCB-SD0000017638

Saint Louis Regions. This will eventually cause high control costs at W. G. Krummrich, which is in an area of relatively high pollution.

In Missouri, Peabody Coal dropped plans to open a low-sulfur coal mine for the Saint Louis area. The control agencies are trying to force compliance this coming winter with the low-sulfur coal regulation. An injunction suit will be heard September 3 to delay the date when low-sulfur coal must be burned. Chicago delayed for one year enforcement of their low-sulfur coal ordinance because of inability of the coal market to supply the coal.

II. W. G. KRUMMRICH PLANT

A. Water

Phenol losses to sewer were generally lower with May performance outstanding:

April	-	1,335 pounds per day average
May	-	890 pounds per day average
June	-	1,263 pounds per day average

vs. First Quarter average of 1,671 pounds per day and goal of 1,100.

Contamination of the Ranney wells and of the test wells around the toxic landfill was substantially lower -- due probably to sustained high river levels.

Sauget Village applied for the conditionally approved federal grant for the waste treatment plant. The treatment plant was idle during the entire quarter due to high river levels and inability of the new Corps of Engineers pump station to operate.

A "Total Oxygen Demand" instrument was tested as a continuous waste monitor. Test was generally satisfactory and a unit will be ordered. Performance of this unit vs. the "Total Carbon Analyzer" at Nitro will be watched carefully so as to guide in selection of monitors for other locations.

B. Air

The Buell dust collector on #9 boiler is operating at only about 75% efficiency vs. 94% guarantee. Reason is unknown and the vendor is working with us to solve the problem. Meanwhile, two additional units are being installed on Nos. 7 and 8 boilers.

WATER_PCB-SD0000017639

A bag house for dust from the ACl drier was approved by the Inorganic Division. Completion of this project (EDC December, 1969) should halt the intermittent problems with "oxidant" emissions experienced over the past several years. This problem has been potentially very serious from the public relations viewpoint.

A rupture of a safety disc in Santoflex 77 operations caused $9,000 of auto paint claims.

In late June, a biologist from a Washington University task group studying air pollution called attention to "growth regulator" foliage damage over a wide area west of the J. F. Queeny Plant. W. G. Krummrich Plant is collaborating in the investigation, but there is no real evidence that an emission from W. G. Krummrich caused the problem. We can expect adverse publicity when the biologist's report is released.

III. J. F. QUEENY PLANT

A. Water

The Scope and Authorization Request were prepared for CEA-2107 (Waste Segregation and Neutralization, NFC $960,000) needed for preparing acidic wastes for municipal treatment. The Corps of Engineers gave permission for submerging our river outfall through which clean acid will be discharged without further treatment. In late June we received notification that our share of the cost of the Corps of Engineers floodwall pumping station was being further escalated to "over $400,000." Our entire commitment to this project is being reviewed.

The Bisphenol A phenol reduction project was completed, but total reduction expected was not attained. Problem is under study.

B. Air

The Particulates and Odor Survey is mostly completed. This survey will establish priorities for further vent clean-up projects.

CED is proceeding on Scope preparation for installing a dust collector on #16 Geyer Avenue boiler.

Coal suppliers are being contacted for possible supplying of low-sulfur coal during the forthcoming winter in event the Peabody injunction is denied in early September.

WATER_PCB-SD0000017640

IV. NITRO PLANT

A. Water

Pilot plant testing of the activated sludge process is continuing with good waste destruction in reasonable sojourn time but with continued difficulty maintaining and building sludge. This means that, in event of severe mechanical sludge loss or sludge poisoning, a future treatment plant could be out of action for an extended period (several weeks). We need to discover what is inhibiting sludge growth and then to provide alternate in-plant disposal for the inhibitor(s). As an alternative procedure, in case in-plant control is not feasible, would be to set up very tight controls on operation of the plant.

With advent of warm weather, treatment efficiency of the present aerated lagoons increased considerably so that, as long as the aerated lagoon treatment was functioning normally, waste discharge loading was well below permit level. However, failure of the neutralization bed by in-plant excessive losses of H_2SO_4 necessitated operating at low rate for three weeks followed by renewal of the bed in late May. Procedures for handling H_2SO_4 were surveyed and procedures instituted to prevent recurrence of the excess losses. Control of Tall Oil losses was excellent throughout the entire quarter.

CED is proceeding on scope preparation for conversion to the activated sludge process. Pre-project approval was given for purchase of three additional aerators (floating type) to increase treatment capacity of the present lagoons. These aerators will be used in the activated sludge process later.

B. Air

No activity. Citizen/politician complaints about air pollution in the Kanawha Valley apparently are becoming more vocal.

V. DELAWARE RIVER PLANT

We signed a contract for our share ($34,000) of the engineering and pilot plant study for regional treatment by the DRBC. A consultant was retained by the DRBC and the study is under way.

The pilot plant testing of our wastes by a Saint Louis consultant showed that our wastes are reasonably amenable to treatment by the activated sludge process including the wastes from the phosphate esters plant.

Most of the pollution abatement projects are reasonably

WATER_PCB-SD0000017641