Monsanto

COMPANY CONFIDENTIAL

FROM (NAME & LOCATION) E. E. Stewart - WGK

DATE June 3, 1971

SUBJECT STATUS - PCB POLLUTION CONTROL PROGRAM

REFERENCE

TO : Mr. J. R. Savage - G.O.

cc: Messrs. G. L. Bratsch
P. E. Heisler
C. Buckley/M. Foresman
P. B. Hodges - G.O.
D. W. Jackson
A. Leisy/R. McCutchan
W. R. Richard - G.O.
W. C. Engman

This is the June 1, 1971 status of the pollution control program.

I. PCB Level in Sewers

Aroclor sewer loss control data are attached. Comments are relative to the period 4/18/71 through 5/27/71.

A. Aroclor Department - A major loss of about 500 gallons occurred during the reworking of wet material that had been returned from a customer. Material boiled out of tank when heating. Rework procedures are being reviewed and enlargement of the department sump are actions being taken to prevent another incident. Exclusive of the major loss, the average daily loss from the department was 1#/day with a range of 0.03 to 1.8 #/day.

B. Total Plant - Plant exit losses averaged 21#/day with a range of 11 to 61 #/day. The slug flow loss from the Aroclor department did not appear of the same magnitude at the plant exit sewer streams. Also the treatment plant influent stream is about 3-4 times greater than the plant exit. Samples from other Sauget Village industries reveal insignificant amounts of Aroclor.

C. Treatment Plant Effluent - Average daily loss of 27 #/day with range of 8# to 75 #/day.

II. Project Status

Two Aroclor units in the plant remain to be changed to non-PCB type fluid. Dept. 239 unit scheduled for mechanical tie-in week of 6/15 to permit fluid change. Dept. 245 unit to change fluid week of 6/1.

The following are miscellaneous approved projects required to contain losses in the event they occur.

PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 32

CER 011206

CONFIDENTIAL 92-CV-204-WDS

Estimate No.

2095	"Aroclor Scrap Rework" EDC 7/1/71 To permit proper rework of returned material to Dept. 246.
2422	"Paving and Curbing" EDC 8/1/71 To contain losses in tank car and storage area in Dept. 246.
2482	"Contaminant Collection at Rip Track" EDC 9/1/71 - To permit recovery of T/C washings and drainings.
2675	"Air Pollution Control" EDC 10/1/71 Nitrogen blanket on mix tanks to eliminate atmospheric pollution at Dept. 246.
2811	"Pave under Therminol Unit" EDC 8/1/71 Contain material in Dept. 246.

III. Program Status

Very little PCB being found in off-gas system by sampling or trapping. Confirms calculations. No additional equipment required in off-gas system, but present traps should remain an integral part of the system.

E. E. Stewart
Technical Services Dept.

/br
Att.

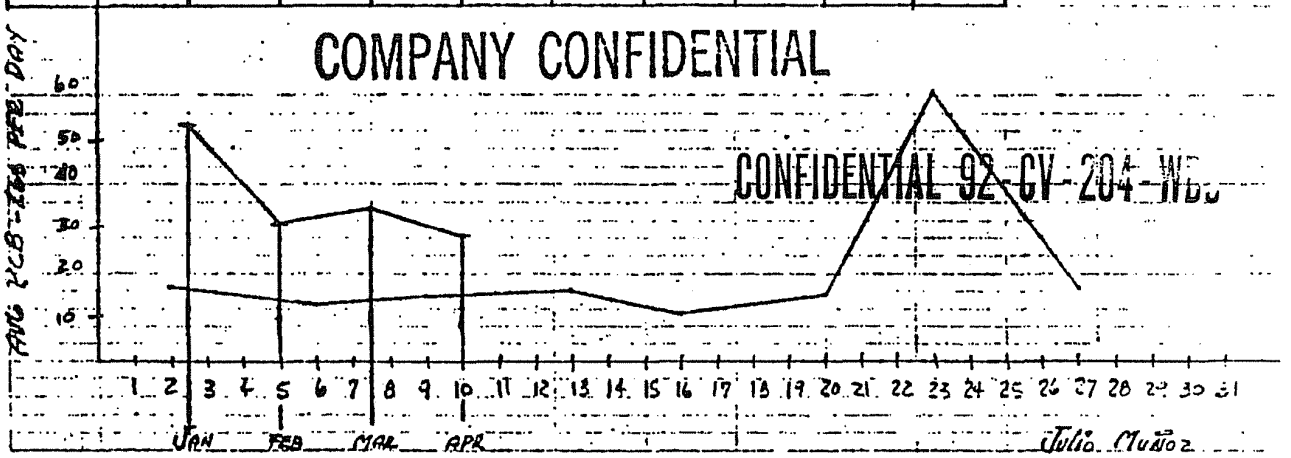
CONFIDENTIAL 92-CV-204-WDS

WATER_PCB-SD0000005653

WGK PLANT — PCB LOSSES - LBS PER DAY — MAY-1971

	MAIN SEWERS			WTP		DEPARTMENTS				
DATE	30W	24W	PLANT TOTAL	INF	EFF	246 AT 24N	246 AT 254	236-37	24E	
5-1										
2	14.5	2.6	17.1	34.3	40.5	1.8	—	29.8	0.84	
3										
4										
5										
6	9.1	4.6	13.7	34.3	26.6	1.2	—	58.5	0.18	
7										
8										
9	12.1	3.1	15.2	42.3	12.2	0.7	—	12.2	0.53	
10										
11										
12										
13	3.2	13.2	16.4	87.3	23.1	1.1	—	0.50	0.15	
14										
15										
16	2.9	8.5	11.4	25.2	7.7	2.1	—	—	—	
17										
18										
19										
20	5.6	9.7	15.3	122.5	24.8	—	0.14	0.29	0.50	
21										
22										
23	55.5	5.8	61.3	32.8	12.1	—	0.03	0.62	0.97	
①24										① Aroclor sp.? at 246
25										
26										
27	6.1	10.5	16.6	138.5	40.5	—	—	0.57	0.31	
28										
29										
30										
31										
AVG										

COMPANY CONFIDENTIAL



CONFIDENTIAL 92-CV-204-WDO

PCB - PLANT TOTAL

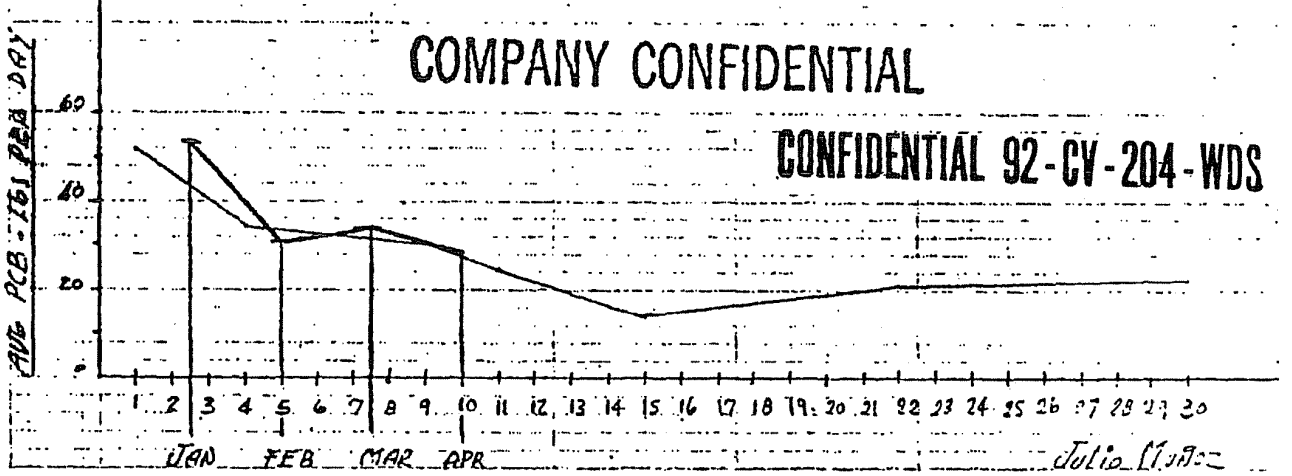
CER 011208

WATER_PCB-SD0000005654

PCB LOSSES - LBS PER DAY

WGK PLANT — APRIL - 1971

	MAIN SEWERS					WTP		DEPARTMENTS			
DATE	30W	24W	25B *	E *	PLANT TOTAL	INF	EFF	24B at 24N	23B-37	24E	REMARKS
4-1	48.60	4.27	—	0.20	53.07	32.0	18.3	1.35			* Discontinued
2											
3											
4	24.50	10.00	—	—	34.50	93.5	26.7	1.10			
5											
6											
7											
8											
9	20.60	9.65	—	0.14	30.39	81.8	6.8	1.30			
10											
11	20.30	3.98	—	—	24.28	22.6	17.3	0.37	112.0	—	
12											
13											
14											
15	8.10	6.65	—	—	14.75	106.0	32.3	0.76	—	0.63	
16											
17											
18	—	—	—	—	—	29.2	9.6	1.32	25.4	—	
19											
20											
21											
22	9.30	12.10	—	—	21.40	220.0	75.0	0.68	12.5	0.31	
23											
24											
25	—	—	—	—	—	48.0	13.5	1.44	8.8	—	
26											
27											
28											
29											
30	9.3	13.2	—	—	22.50	53.0	20.6	0.63	67.0	0.37	
AVG	20.10	8.55	—	—	29.67	76.35	24.45	1.00			



PCB - PLANT TOTAL

Julio Munoz

COMPANY CONFIDENTIAL

CONFIDENTIAL 92-CV-204-WDS

CER 011209

WATER_PCB-SD0000005655