Monsanto

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FROM (NAME & LOCATION): P. E. Heisler - W. G. Krummrich Plant

DATE: February 26, 1974

SUBJECT: PROPOSED PCB PLAN

REFERENCE: E.E.Stewart's "Proposed PCB Standard" of 2/21/74

TO: G. L. Bratsch

cc: A. E. Leisy
D. C. Otto
G. A. Hippe
W. C. Engman
~~E. E. Stewart~~
C. F. Buckley
G. L. Johnson
H. J. Horner
W. B. Papageorge - B1ND
D. B. Hosmer - E1SF
P. B. Hodges - E1SF
J. R. Savage - E2SL

After the PCP meeting of Thursday, February 21, we met with Production, TSD, Laboratory and others involved and established the following primary responsibility assignments and time table for the actions discussed. We will keep all concerned current on our progress in the regular monthly status report, the "PCB Environmental Control Program". Also, we will advise on the approximate total cost and specific dollar cost for each item as soon as these data are developed.

A) General Items Developed at the 2/21/74 Meeting	Responsibility	Timing
1) Air Monitoring		
a) Review Incineration Monitoring and Report	Buckley	3/15/74
b) Develop Program for Monitoring air emissions from Dept. 246	Buckley with consultation with Production & TSD	3/15/74
2) Disposal of Aroclor Drums		
a) Visit Evans and decide if change is necessary	Heisler/Leisy	2/26/74
b) Develop alternate methods	TSD	4/1/74
3) Determine PCB residual levels at Anniston Plant		
a) Develop Plan	Stewart OK	3/1/74
b) Measure	Stewart OK	4/1/74
4) Sewer Sampling Program to establish a "PCB Balance"		
a) Develop a plan	Buckley	4/1/74
b) Implement and establish balance	Buckley	5/1/74

		Responsibility	Timing
A)	General Items Developed at the 2/21/74 Meeting (continued)		
	5) Communication and Educational Program (similar to "Mercury effort").	Otto	4/1/74
B)	Items to attain Goal I (Department losses <1# day)	WGK Plant	1/1/75
	1) Upgrade sump at Incinerator area to better recover PCB's that collect in the 10,000 gallon sump.	TSD	(open)
	2) Expand existing drum pad and provide additional curbs in Incinerator Area.	TSD	(open)
	3) Start and demonstrate off-gas scrubber in Aroclor Department.	TSD/Prod.	2/27/74
	4) Eliminate aeration step in the continuous process in Aroclor Dept. Project being installed at present.	TSD/Prod.	3/8/74
	5) Improve sampling pick-up and facilities at Incinerator area.	Buckley/TSD	(open)
	6) Monitor cooling water systems in Aroclor Department to discover equipment failure with possible resultant discharge of PCB to department effluent streams.	Buckley/Prod.	4/1/74
	7) Develop statistical data analysis technique to better spot out-of-control condition in Aroclor and Incinerator area.	Gloeckner	5/1/74
C)	Items to attain Goal II (Other Plant Losses - 0# day)	WGK Plant	4th Quarter 1975
	1) Institute a procedure to control handling of returned drums to eliminate losses within the plant.	Johnson	4/1/74
	2) Discontinue tank car and tank trailer washing operations at Repair Track area.	Prod./TSD	(open - as soon as possible)

		Responsibility	Timing
C)	Items to attain Goal II (continued) (Other Plant Losses - 0# day)		
	3) Continue present housekeeping practices in department and throughout the plant with regard to containment of PCB's.	Johnson	3/15/74
	4) Determine effect of PCB's that are presently sulfonated in the chlorosulfonic acid scrubber.	Horner	7/1/74
	5) Develop statistical data analysis technique to better detect loss trends and assist in definition of "background" losses.	Gloeckner	5/1/74
	6) Continue the HCl off-gas header control to virtually eliminate possibility of inadvertently sewering gas at Dept. 236.	Leisy	4/1/74
D)	Items to attain Goal III (Losses to River - <1# day)		
	1) Background losses must be identified.	Buckley	8/1/74
	2) Laboratory experiments must be performed to predict the expected reduction in PCB's that will be possible in the soon-to-be installed Chemical Treatment Plant at the Sauget Waste Treatment Plant.	Horner	10/1/74
	3) Develop and implement required additional actions.	Leisy/Heisler/ TSD	As necessary
	a. Clean sewers b. Repair and replace portions of plant sewer system where necessary. c. Remove contaminated chat and soil throughout the plant where necessary.		

Please advise if there are any comments or questions.

P. E. Heisler

/ghw

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