1969 3/21/74

July started analyses

July October losses @ 700#/day from plant
Discontinued deliberate sewering of trochlor dry all groups
Hand tank can washes to land fill
Wains placed in Aroclor trenches

Now @ 230#/day from plant

1970
1/2 Sampling plan developed for 246 Dept
Jan Dept 246 sewer losses @ 130#/day
mostly from drowning jet on blow tank
GOAL TO REDUCE DEPT LOSSES TO 10#/DAY BY 1/1/71
Plan to REST OF PLANT 40#/DAY
Piping alteration @ $15,000 From blow tank to scrubber. Alter rupture disc venting
Catch Basin 15,000
Brink demister 30,000

$400 April — WGK lab begins efforts to analyze for PCB at WGK laboratory
$2700 May — Blow tank piping alterations to eliminate pyrolysis
COMPLETE PROJECT "OFF-GAS PIPING ALTERATION" Sewer after condenser & demister
June PLANT GOAL IS 10 PPB ≈ 2.3#/DAY FROM TREATMENT PLANT
MEANS ESSENTIALLY ZERO FROM USING DEPTS

June Losses from production dept @ 65#/day
$20,000 July South settling basin installed — after absorber relief line
Sept Implemented PLAN TO STORE USED THERMINOLS, AROCLORS
PYRANOLS for all plant depts pending installation of incinerator
To store at South Lot

Plan to pave, provide curbs, trenches and catch basin in T/C & T/T loading area.

ACTIVITIES TO CONTAIN AROCLORS at Dept 273

$6000 Nov. WGK lab chromatograph back in service
$23000 PROJECT complete for BLOW TANK DEMISTER
Major loss at Dip Tanks
$2500 PROJECT to provide 150,000 gallon scrap Aroclor sty complete

IMPLEMENTED SWITCH to THERMINOL 66 AT 255
Dec Estimates losses from Dept 246 about 70#/day

Losses from Aroclor Dept @ 0.6#/day
Losses from Treatment plant @ 34#/day
All depts in plant told to change out therminol units
GOAL STILL 10 PPB AT WASTE TREATMENT PLANT

DSW 296123

STLCOPCB4066067

1971

Jan Thermimal unit changed in ONA
Discontinued washing loaders trailers at terminal to work in plant
GOAL 10 ppb in treatment plant effluent by 9/1/71

$\frac{10}{10^9} = \frac{x}{20\bar{M}\ gal/day}$ $x = \frac{10 \times 20 \times 10^6 \times 8.34}{10^9} = \frac{10 \times 2 \times 10^7 \times 0.834 \times 10}{10^9} = 16\#/day$

Feb Changed 2 of 3 units in ACL

March Changed 244 units

$80,000
June All Thermimal units changed

August Discontinued off-gas to F218

$970,000 Started 1016 Distillation
$610,000 Started Aroclor Incineration
August & September - Additional sampling & study of 24" & 30" sewer data

Oct Task Force activated
GOAL PCB to 1#/day from WGK
Additional sampling study
slow vs fast
filtered vs unfiltered
More intense dept control system implemented re settling basin - off gas clean up

Nov Losses increase with production of Aroclor 1109
Start draining water from H2O/PCB tank car washes 11 cars used for stg

$40,000 Paving & Curbing complete in 246 Stg, T/C, T/T area
$3000 " " around 246 Thermimal Unit

Dec Fast samplers about 3 times amount picked up by slow samplers Functions of solids picked up?

	246	Plant	Inf	Eff
Jan 1971		44#	84#	49#
Dec 1971	≃1#	4#	11#	4# (6#)

Spent much of the last 5 years of attempting to replace sampling discrepancies

DSW 296124

STLCOPCB4066068

1972

Traverse sampling at WTP Influent

Jan Discontinued routine sampling in plant. Routine sampling at WTP only
Modified system installed at Rip Track to catch & decant T/C works
off gas calculations indicate possible ≥ 10#/day PCB's on the present
North Settling Basin installed
Started producing 1105 on 1/27

Feb WTP EFFLUENT LOSSES LEVEL AT 10#/DAY
EXPECT TO GET TO 5#/DAY IN OCT/72

Produced 1105 and all off-gas sewered

Project Enlarged south settling basin completed

March Laboratory tests to discover scrubbing media for off-gas
Additional testing of samplers
Dept operator control technique being implemented
GOAL IS 1#/DAY FROM OPERATING AREAS (246 INCINERATOR, RIP TRACK)
EXPECT RESIDUAL PCB's TO LEVEL ABOUT 5#/DAY

April Coordinating 246-217 production
Policy adopted to not operate 246 when 217 is down
Pump Shop project complete
Eliminate excess water flow to reduce possible solubility losses

May Flip Flop — WTP drum comparison samplers
Flip flop higher

DSW 296125

June FIRST WGK STRATEGY MTG
(started tracking "knowing losses" & min data

$40,000 NEW DEPT SAMPLING STATION IN OPERATION
SEWER LINES FROM DEPT ARE NEW
Discontinued Air Blowing of continuous unit 6/6 & batch @ 6/26
Removed Flip Flop from WTP
→ RECORD LOW PCB EFFLUENT ATTAINED AT 2#/DAY

July Additional Fish Data obtained

Aug — Resumed Air blowing (possible related corrosion problems)
Torrential rain during month
IN-HAND DOCUMENT PREPARED FOR FEDS

Oct — SECOND WGK STRATEGY MTG
Difficult to not sewer when 246 is sole supplier of gas for C/S

	246	Plant Inf	Eff
Dec 71		4 = 11	4 (6)
Oct 72	12#	5#	4# (had been to 2#)

Dorsal [illegible] sig reduction in load

STLCOPCB4066069

1973

Jan - Pumping from North Settling Basin to South Settling Basin

Mar - Project for Off-Gas Scrubber approved
Proportional to flow on 4-2 sampler

April - Screening large excess gas at Dept 217

July - Upward trend at Waste Treatment Influent
Starting early in late June

Aug - Tie-in made on 236 Hi Line
Effluent losses starting up in about 1/3 thru Aug

Oct Problem of increased PCB's being seen in
Rip Track & PCB Mass Stg area

Nov Increased sampling program

Dec Sewer failure at Rip Track
Drain at Incinerator drum stg not going to sump

	Dept	Plant	Inf	Eff
Dec 73	< 1#/day		10#	5#
Dec 72	1-2		5	4#

1974

Early 74	7#		15	10

Jan Discontinued washing T/Cs at Rip Track

DSW 296126

STLCOPCB4066070