



TO: R. R. Neugold
FOR: F. W. Kanzler
FROM: Monthly Report
Environmental Affairs
RE: October, 1984

DATE: November 5, 1984

COPY TO: R.S. Cole
W.W. Heal
J.W. Kachtick
C.J. Kotrla
R.D. Towe
File

I. EPA-NJDEP

A. Water

1. DMR

The storm pond and Wastewater Treatment Plant effluent water data available to date show compliance.

The Wastewater Treatment Plant continued to perform well. The BOD and COD levels rose during the fourth week of this report period, however, were brought back to normal levels within a few days. No apparent reason for the increase was identified.

2. NJPDES-DSW Permit

As expected, the DSW Permit was received on 10/10/84. The previously-discussed waivers for the TDS and ammonia-N parameters are included in the Permit. The effective date of the Permit is 12/1/84.

The auto sampler was received on 10/30/84. It is expected that the TDS Sampling Program will commence during the second week of November.

Samples of primary effluent water were sent to Flemington R&D as part of the Methodology Evaluation and Solids Identification Program.

As part of the above waiver conditions, a treatability study of the ammonia-bearing chemicals is required. The feasibility of a in-plant study, rather than a bench scale evaluation, is being investigated. In any event, it is expected that additional manpower is needed to provide analytical support.

3. NJPDES-DGW Permit

As the result of the the necessary language changes needed for this Permit, NJPDEP initiated a 30-day extension of the comment period,

At a meeting on 10/17/84, these changes were discussed. In addition to personnel from NJDEP, DWR and DWM, N. Valkenburg (Geraghty & Miller), J.W. Kachtick and I attended on behalf of Tenneco.

Also reviewed at the same meeting was the RCRA status of the Burlington Facility. It appears that the SWA stands ready to delist us from a TSDF (IWMF under New Jersey Regulations) to a generator only, however, the SWA requested a total hydrocarbon analysis of the raw sewage prior to granting "Generator" status.

The first set of groundwater samples from the eleven groundwater monitoring wells was collected on 10/22 and 10/23/84. Results are expected to be available during the latter part of November.

4. Water Allocation Permit

The previously-discussed Application to approve our groundwater diversion was sent to DRBC.

As part of the "special conditions" of our Water Allocation Permit, well #6 was sealed during this report period.

5. NJDEP Wastewater Treatment Plant Inspection

Personnel from the Central Field Office conducted a routine compliance inspection of the Treatment Plant on 10/23/84.

No inspection report received from the Agency to date. Experience over the past years indicate that a report can be expected early 1985.

B. Air

1. NESHAP

- a. Suspension and Dispersion Slurry
No excursions reported.
- b. Reactor Tower Openings
No excursions reported.
- c. Water Stripper
No excursions reported.
- d. Incinerators
No excursions reported.

2. Administration Consent Order

As previously reported, applications to "amend" nine permits for storage silos in the Compound Unit service were prepared and sent to NJDEP-DEQ, Permit Section on 10/12/84.

3. NESHAP and Stack Inspection

Personnel from the Enforcement Group NJDEP-DEQ, Central Field Office, visited at the Burlington Facility three times during this report period.

The Agents were provided with information and given the opportunity to study the process flow of the Suspension and Dispersion Plants. NESHAP requirements and data was discussed. A plant tour provided the Agents with the opportunity to see the physical set-up of the reactors and strippers.

Subsequent to the discussions on NESHAP, emissions from "after" NESHAP equipment were discussed. The Agents questioned our compliance with Subchapter 16 (VOS) and 17 (TVOS), notwithstanding the letters from NJDEP indicating compliance.

The Agents requested emission data for VCM, VAM and TCE for "after" NESHAP equipment. In addition, we will prepare amendments to permits for equipment emitting VOS and TVOS.

C. Solid

1. Landfill Closure

The response to our letter to Mr. W. Burshtin, NJDEP-DWM, in which we were seeking advice on how to proceed with cover material for the landfill, was a request to submit a soil conservation plan within thirty days to both NJDEP and the B.C. Soil Conservation District. It is expected that the Plan will be ready for submittal by 11/5/84.

2. Sludge Dewatering

An in-plant filter press evaluation, utilizing the Netzsch filter press, was conducted on 10/26/84. The primary sludge dewatered well to about 48% solids. Samples were sent to the Laboratory for SQAR and EPT testing.

3. RCRA Inspection

NJDEP-DWM, Southern Field Office, conducted a RCRA inspection on 10/31/84.

We were found in compliance with the exception of the following items:

- a. HW Laboratory accumulation not 50 feet from property line (N.J.A.C. 7:20-9.4(d)(6).
- b. No level indicator or inventory control program on waste oil storage tanks.
- c. No structured arrangements with local authorities as required in N.J.A.C. 7:26-9.4(g)8, -9.6(f)5, -9.7(i) and -9.16(f)4.

We will send a letter of response to the inspector related to the above items within two weeks.

II. OSHA

A. VCM

1. Personal Monitoring

Two of the thirty-two employees monitored for VCM exposure showed 8-hour TWA's above the PEL. ~5%

B. Lead

1. Personal Monitoring

The third quarter monitoring results revealed two out of six employees monitored above the PEL for airborne lead. 33%

III. MISCELLANEOUS

A. Meetings and Seminars

1. Chamber of Commerce - Environmental Committee

Attended presentation and discussion of new proposed surface water standards on 10/9/84. NJDEP made the presentation.

2. CIC

Substituted for R.R. Neugold on 10/19/84. Senator Lautenberg was Guest Speaker.

3. Environmental Exposition

Attended the first day session on 10/23/84.

Fred W. Kanzler
F.W. Kanzler

FWK/jst