J. R. Savage - General Office

December 4, 1970

Mr. H. S. Bergen
Mr. P. B. Hodges

NOVEMBER PCB REPORT

Manufacturing

Mr. W. B. Papageorge
General Office

W. G. KRUMMRICH PLANT

PCB Levels In Sewer

A. Aroclor losses from the Aroclor Department averaged about 1.0 lbs/day and ranged from about 0.4 to 2.5 lbs/day.

Losses from the Sauget Village treatment plant for the period 10/16 - 11/16 averaged 72 lbs/day (495 ppb). Range for 9 samples was 32 to 115 lbs/day (220-796 ppb).

B. Losses from the North Area departments (258, 270, 275) averaged 8 lbs/day based on a 15 day composite. A sampling program to identify and monitor sources of Aroclor losses throughout the plant is targeted to begin by 1/1/71.

C. Sewer effluent samples are being taken at the other industrial plants to determine their contribution to the total losses at the treatment plant.

Projects To Reduce Sewered PCB's From Aroclor Department

A. Blow tank demister (Est. 2031) project was successfully demonstrated. About 100 lbs/day of mist Aroclor is being collected. Sewer loss has been reduced from about 20 lbs/day to about 0.5 lb/day.

B. Project to provide paving, curbs, trenches, and catch basins in the tank car and truck loading areas has been approved as part of the Aroclor incinerator project. The design package is about 75% complete.

Program To Eliminate Sewered PCB's From Using Departments

A. A second meting with Don Roush is scheduled for 12/7/70. Don will discuss with plant production and engineering personnel design considerations for changing Therminol units to non-Aroclor Therminols.

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PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 28

Program To Eliminate Sewered PCB's From Using Departments (Cont'd)

W. G. Krummrich Plant

B. Status of work on Therminol units is as follows:

Dept. 255	Switched from FR-2 to Therminol-66 on 11/16/70.
Dept. 222 O & P, Dept. 273, Dept. 246	Plans underway to change out these systems to Therminol 66. EDC for all units is 3/1/71.

Status reports on the other Therminol units are attached.

Removal Of Soluble PCB's From Sewer Stream (Reach 10 ppb)

A test is planned for the week of 12/7/70 to determine effect on Aroclor losses in the treatment plant effluent by neutralizing the sewer flow to the treatment plant. Lime will be added at Dept. 265 for about 3 days to hold the pH above 7.0 at the treatment plant. The resulting floc is expected to improve PCB removal based on Anniston work.

PCB Levels In The Atmosphere

Sampling program has been completed. Only significant area of loss is at the mix tanks due primarily to the nitrogen purge. Loss is in the range of 4 to 5 lbs/day. Plans are to replace the nitrogenpurge with a nitrogen blanket.

PCB Rework Project (Est. 2095)

Project approved as part of the Aroclor Incinerator project. Construction schedule will be determined in December.

ANNISTON PLANT

PCB Levels In Sewer

Aroclor losses during November averaged 25#/day (4620 ppb). One high value accounted for 18#/day, neglecting this the November average would be 7#/day (1410 ppb). Based on knowledge of plant operations and performance of abatement devices in November, much of the high level data is due to sample contamination.

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ANNISTON PLANT (Cont'd)

Spills

Minor leaks were contained by use of sand and disposal in drums. No spills occurred.

Projects and Evaluations

1. Laboratory work to date indicates the presence of minimal amounts of PCB in the residue from Solid Aroclor distillation (Montar 5). This eliminates 10M pounds per year or solid wastes from our PCB disposal plan.

2. Design work to collect spent carbon from HCl carbon towers has been deferred to early 1971 to accomplish the No. 1 HCl Limestone Pit rebuild.

3. Solids removal from plant effluent (part of program to reduce PCB in plant effluent to 10 ppb) is moving forward with preliminary screening tests at Denver Equipment Company and Betz Laboratories indicating good to moderate success with flocculation and settling. Further laboratory testing is scheduled for early December. A project has been written, design is underway and equipment modifications under study working with Monsanto Biodize to set up one of their clarifiers at Anniston for pilot scale testing of the apparent best techniques recommended by Denver and/or Betz.

4. A successful test was made of removal of limestone inerts from the #2 HCl neutralization pit while in operation. A total weight of 127,000 lbs was removed of which 36% by weight was solids. Lab analysis of the total material revealed more than 100,000 ppb Aroclor or 12 to 15 lbs of Aroclor. Present indications are that this method of removal of solids while the pit is in operation will increase the efficient life of the pit by 25%.

5. A mechanical expense project for repair of the No. 1 HCl neutralization pit was written and approved. This project will be coordinated with the Niran pit project to apply on asphalt lining at the same time, to save money on materials.

NEWPORT PLANT

The October Newport Report has not been received.

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J. R. Savage

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