Bill? Who? How? and When? are we going to do IV-3, IV-4

Santo

(NAME & LOCATION) W. C. Engman - WGK

DATE January 5, 1971

SUBJECT STATUS OF PROGRAM FOR AROCLOR POLLUTION CONTROL

REFERENCE

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

cc: Messrs.
G. L. Bratsch
C. F. Buckley/M. R. Foresman
B. W. Corlew
P. E. Heisler
P. B. Hodges - G.O.
D. W. Jackson
W. A. Krull
R. M. McCutchan
F. McDonald - Newport
A. L. Rasmussen
W. R. Richard - G.O.
J. Corder - Anniston
B. Young

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

I. PCB Levels in Sewer:

A. Aroclor losses from the Aroclor Department averaged about 0.6 lbs/day and ranged from about 0.2 to 1.4 lbs/day.

Losses from the treatment plant for the period 11/17-12/17 averaged 34 lbs/day (177 ppb). Range for 7 samples was 9 to 53 lbs/day (47-280 ppb). Samples taken during the 5 day neutralization test (12/15-12/17) are not included. Average for this period was 27 lbs/day.

B. Program to monitor the various plant sewers was begun the last week of December. Plans are to composite samples twice per week for analysis.

C. Sewer samples were taken from the effluents of the other industrial plants. These included:

Midwest Rubber	9 ppb
American Zinc	6 ppb
Cerro Copper & Brass	9 ppb
Mobil Oil	54 ppb
Dead Creek	18 ppb
Village	2110 ppb

The only significant quantity is the PCB's from the Village sewer. This amounts to about 2 to 3 lbs/day. Probable source is Aroclor trailer washes at Rogers Terminal.

II. Projects to Reduce Sewered PCB's from Aroclor Department

A. Design package for project to pave and trench loading areas is 95% complete and will be issued by 1/15/71.

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PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 29

HARTOLDMON0007255

III. Program to Eliminate Sewered PCB's from Using Departments

Jerry Bratsch has requested by memo that all General Superintendents proceed at once to change out all therminol units to non-Aroclor heat transfer fluids.

IV. Removal of Soluble PCB's from Sewer Stream (Reach 10 ppb)

A 3 day test was run 12/15-12/17 in which the entire plant effluent was neutralized with lime. Results indicated no change in the average level of PCB's in either the influent or the effluent at the treatment plant at the 90% confidence level.

At this point, it appears possible to reach the goal of 10 ppb without secondary or tertiary treatment by doing the following:

1. Change out of all plant therminol units to non-Aroclor fluids.
2. Continue control of losses at the Aroclor Department at less than 1.5 lbs/day.
3. Clean all contaminated sewers and sewer boxes.
4. Monitor and control Rogers Terminal.

V. PCB Levels in the Atmosphere

A project premise and estimate for $6,000 were prepared to replace the nitrogen purge with a nitrogen blanket at the mix tanks and to reroute the chlorinator rupture disc linea to the pad.

A sampling station will be shared with the chlorine department to monitor PCB content of air downwind from the Aroclor Department. Samples will be taken every other week starting the week of 1/11/71.

VI. PCB Rework Project (Est. 2095)

Project package is essentially complete and will be issued the week of 1/4/71.

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W. C. Engman

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Technical Services Dept.

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