Monsanto

COMPANY CONFIDENTIAL

FROM (NAME & LOCATION): E. E. Stewart, WGK

DATE : October 2, 1972

SUBJECT : STATUS - PCB POLLUTION CONTROL PROGRAM

REFERENCE :

TO : Mr. J. R. Savage
General Offices
B2SL

cc: G. L. Bratsch
C. F. Buckley
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W. R. Richard - G.O. (T3A)

This is the October 1, 1972 status of PCB pollution control program.

I. PCB LEVEL IN SEWERS

September "knowing PCB losses" from the operating department and the incinerator area at 0.72 #/day are slightly lower than last month. Losses measured at Waste Treatment Plant Effluent of 3 #/day are 50% lower than last month. Waste Treatment Influent losses of 8 #/day are also lower than August and reflect background from plant and neighboring industries and village.

Aroclor sewer loss control data are attached.

A. Aroclor Department - Continuous samples taken from main department effluent stream average 0.55 #/day. Department operating below capacity and Aroclor and Chlorosulfonic operations are coordinated so as not to sewer off-gas at the Aroclor Department. Continued air blowing during the entire month. Premise for long range correction will be issued in October.

B. Incinerator - Measured losses averaged 0.17 #/day. Incinerator in operation about 1 week but had to shut down for repairs. Losses are about one-half of last month. Extra effort being made to limit storage of drums within the sumped operating area and not in roadway where leaks can get into plant sewer system.

C. Total Plant - Average losses measured at Influent dropped from 14 #/day at beginning of month to 8 #/day at month's end. September rains were above normal and probably was a factor in PCB flow to Waste Treatment Plant as PCB's from ground are leached with rainwater. Gradual decrease in background expected with time.

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PAUL HODGES DEPOSITION
May 31 - June 1, 1994
EXHIBIT NO. 40

HARTOLDMON0007333

I. PCB LEVEL IN SEWERS (Continued)

D. Treatment Plant Effluent - September losses at 3 #/day are half the amount measured last month. This loss is equivalent to about 0.003 ppb in the Mississippi River. EPA guidelines are 0.01 ppb in the river.

II. PROJECT STATUS

Project 3972 - "Reroute North Basin Sewer" - To reroute effluent from department North Settling Basin such that all sewer flow from the department will flow from one point. EDC 12/15/72.

Project 3956 - "Alterations to HCl Distribution System" to eliminate possibility of sewering Dept. 246 HCl gas. EDC 12/15/72.

III. PROGRAM STATUS Re Engman/Bratsch 4/24/72

1. HCl Off-Gas

A. Aroclor - Continuing to coordinate production with operations in the C/S department so as not to sewer off-gas.

B. Estimate prepared to "Install PCB Off-Gas Scrubber" $73,000 capital, $4,000 expense. Appropriation Request being prepared. Will permit operation of the Aroclor department independent of chlorosulfonic operations. Scrubber will also permit recovery of the HCl gas in the proposed adiabatic HCl absorber.

2. Blow Tank Off-Gas

Resumed air blowing 8/14. Had discontinued air blowing about nine weeks ago to reduce PCB loss to the sewer. Premise for longer range correction to be completed in October.

3. Aroclor Department Catch Basin

Project 3972 EDC at 12/15/72. (See write-up under "Project Status".

Project to be prepared in 4th quarter to permit either filtration or carbon treatment of overflow from south basin to permit reduction of losses to essentially zero.

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III. PROGRAM STATUS (Continued)

4. Incinerator Scrubber

No work planned.

5. Incinerator Catch Basin

Project to be prepared in 4th quarter to permit either filtration or carbon treatment of overflow to permit reduction of losses to essentially zero.

6. Rip Track Washer

Did not wash any T/C or T/T during month of September. Will analyze wash water content during October. Future work required (filtration, carbon treatment, etc.) to get PCB content in wash water down to desired 0.01 #/wash.

WGK STRATEGY

Reports being prepared of plant program to control "knowing losses" of PCB to conform with recommendations expected from the federal authorities.

Plant strategy review meeting scheduled 10/20/72.

Edward E. Stewart
Technical Services Department

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att.

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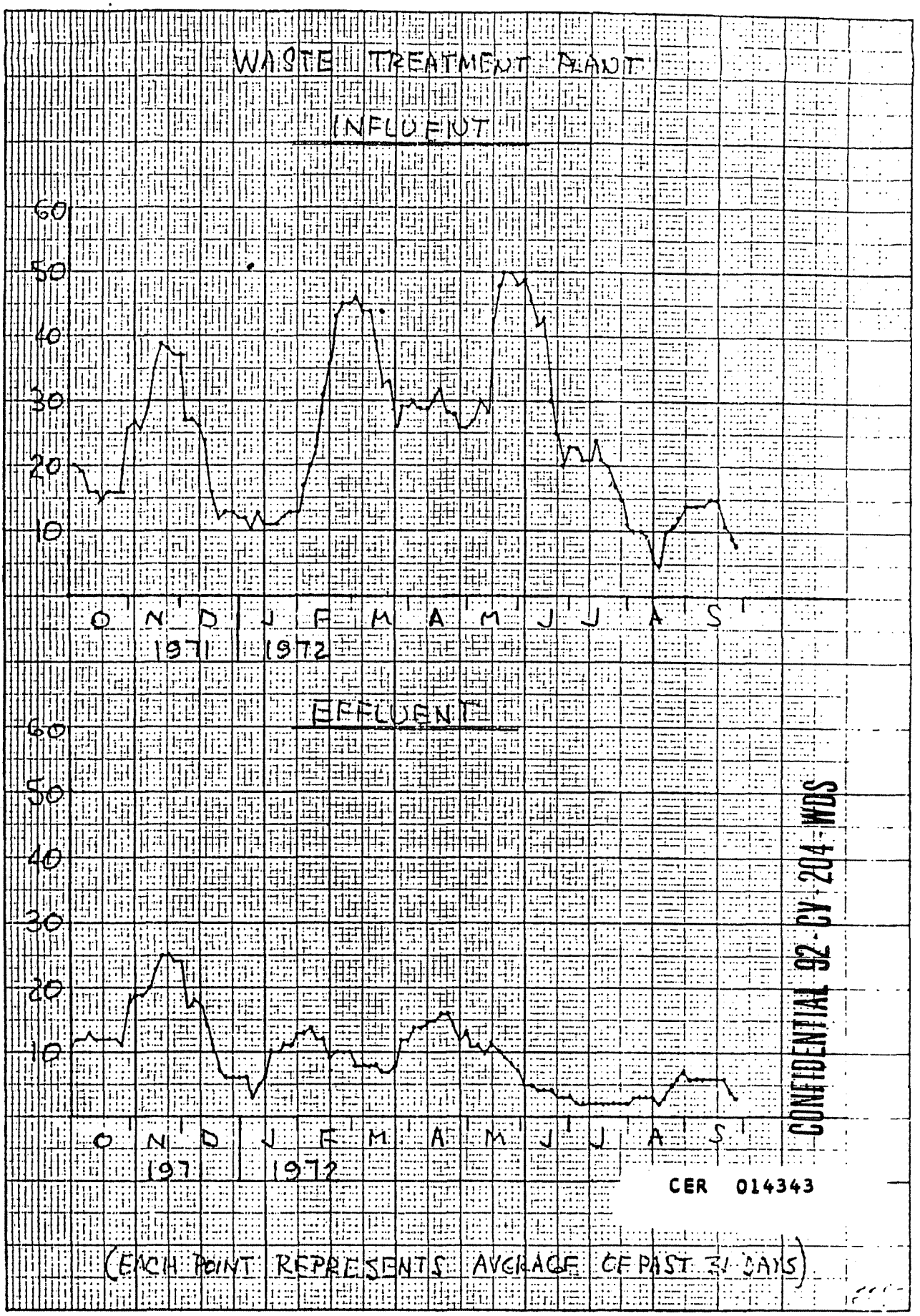

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K-12 20 X 20 TO THE INCH 46 1240
7 X 10 INCHES
KEUFFEL & ESSER CO.

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