Monsanto

FROM (NAME & LOCATION) E. E. Stewart, Krummrich

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SUBJECT PCB CONTAMINANT COLLECTION AT RIP TRACK

REFERENCE

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The facilities installed per Project 2482 at the Rip Track do not permit the required control of PCB losses to the sewer during tank car and tank truck washing operations. The sump tank is not large enough to permit settling of PCB from the car wash before permitting the water layer to flow to the sewer. It is necessary to pump the entire wash to a trailer and subsequently storing/settling/siphoning water layer to the sewer at the incinerator area. Also, a heel is left in the concrete sump tank below the suction of the submerged pump.

It was agreed these actions be taken:

1. Until modification can be made, Rip Track personnel will collect the heel and first wash (700-1400 gallon) in a trailer. While pumping the wash through the concrete sump tank to the trailer the contents in the sump tank will be agitated with air to prevent a heel of PCB from settling in the tank. The material collected in the trailer will be held or stored for eventual disposition at the incinerator.

2. The sump tank should not be stirred with air when passing other product washes through the tank to either a trailer or the sewer. It will be necessary to check the first few operations to determine how well the agitation scheme is working to prevent a heel of PCB from building up in the sump tank.

3. An old anhydrous ammonia trailer will be modified and placed at the concrete sump tank to function as a settling basin. A top entering 4" nozzle will be installed at one end and a 6" nozzle will be installed on the opposite end of the tank. Center line of 6" nozzle to be 20" below top of tank. After trailer modifications are made, the trailer will be spotted and piping will be provided from the pump discharge at the concrete sump tank to the inlet nozzle atop the trailer. 4" piping will be provided to permit overflow from the opposite end of the trailer to the sewer.

   All water washes from Aroclor tank cars or tank trailers will pass through the concrete sump tank and be pumped to this trailer (settling tank) and permitted to overflow to the sewer. Air agitate sump when dropping washes containing Aroclors.

   Initial checks will be made to determine the PCB content in the overflow. Expect about 400 ppb (equivalent to 0.01 # PCB/1500 gallon wash). The level of PCB present will be checked and permitted to build up before hauling trailer to the incinerator for dispositions. Could be in service several months before transfer to the incinerator.

4. Soap or detergent washes will not be used for washing Aroclor cars or trucks. Will follow program and plan.

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