

July 31, 1956

Mr. John Burton  
Newark

Mr. W.R. Taylor  
Central Engineering

Newark Effluent Problem

I have noted with some interest your correspondence relative to the activities of the Passaic Valley Sewage Commission. Apparently we may be in for some extended difficulties with this Commission.

You might want to consider the transfer of all wastes to the City sewer with the possible exception of cooling water and other non-contaminating streams. This step, assuming approval by City authorities, would mean the transfer of legal responsibility for the discharge of such wastes to the City. If dilution in the City sewers is not sufficiently great, the City sewage treatment plant might have trouble in treating the waste and might refuse permission to discharge to their sewers.

The wastes from your plant are complex and in some respects will be difficult to treat on the premises. Treatment to reduce the high B.O.D. would require a large trickling filter similar to the Dow installation at Midland but not as large. I doubt if we would have enough land available for such an installation and thus might have to resort to chemical treatment which would be more expensive. This would lead us to the conclusion that discharge to the City sewer might be the best approach.

The action of the Commission inspectors in "snooping" around the plant is not considered standard practice in the pollution field. Their action might arise for one of two reasons; the inspectors might be young and ignorant of proper procedure or they might be hoping to find evidence of unlawful doings when unescorted. I think your letter to Mr. Andolino had just the right tone and was certainly justified.

As a matter of caution, it might be well to continue a cooperative attitude towards the Commission and to be as frank as you feel desirable. Evasive tactics are fine as long as they work, but discovery of such action by the Commission can lead to a change of attitude which could be serious. If the Commission begins to feel that they have been "had" they may insist on orderly and complete elimination of polluting materials from your discharge. If this happens, it might be a significant factor in consideration of plant relocation.

If I can be of any assistance to you, please let us know.

W.R. Taylor

WRT:jm

CC: D.E. Pierce  
B.D. Gleissner