DRAFT

JULY 10, 1987

REVISED QUESTIONS FOR KEARNY GROUNDWATER CLEANUP AND PCB ISSUE:

1Q: You announced last November that you had submitted a remedial action plan to the N.J. Department of Environmental Protection. Nine months have passed. Why have you waited so long to begin?

1A: As soon as we submitted the plan to the N.J.D.E.P., we began getting ready for implementation. The organic layer recovery system required considerable design and engineering work. It will be operational this fall.

2Q: How concentrated are the PCBs on the property?

2A: The average concentration of PCBs in the ~~half-acre site~~ contaminated area is approximately 100 PPM. The highest concentration found at one location in the soil was 123,000 parts per million at two to four feet below the surface.

MCO 7640186

PCB-ARCH-EXT0371583

3Q: How much is considered dangerous?

3A: There's a lot of dispute about this. Two scientists have recently reported studies saying that PCBs are not dangerous to people. A recent EPA guideline suggests 25 to 50 parts per million to be acceptable. More important, however, is that there is no risk of exposure to employees or the general public from the PCBs contained on this site. PCBs are relatively immobile in soil, are virtually insoluble in water, and, on our property, are buried either under a layer of concrete, or gravel.

4Q: How much will the cleanup process reduce the concentration of PCBs?

4A: We have two separate matters here. First we will remove the layer of organic matter floating on the groundwater. Organics consist of any carbon based molecule, and in this case, refer to compounds similar to those found in gasoline, various fuel oils, and household cleaning fluids. The groundwater in question is not used for any private or public drinking water nor the plant's own drinking water supply. The cleanup will be performed by removing the organics and treating them according to EPA guidelines.

PCB-ARCH-EXT0371584

The other matter is the PCB presence in the contained soil on a ~~half-acre~~ area of the plant. Since the PCBs are bound tightly to soil, are virtually insoluble in water, and do not leak from the containment area. They also pose no threat to employees or the community, the plant plans to leave them undisturbed where they are eventually contained and continue to monitor the site. ~~situation for now.~~ If and when the manufacturing unit shuts down or is to be replaced with an updated facility, requiring the current facility to be dismantled, the PCBs will be removed and disposed of in the most appropriate manner recommended at that time.

5Q: Will the groundwater cleanup remove any PCBs? What will you do with them after they're removed?

5A: The cleanup process is to remove organics from the groundwater on our site. We don't expect to find PCBs in the groundwater. If any are found, they will be removed and treated along with the organics and incinerated according to accepted procedures.

How soon found any?

6Q: Will any of the containment and treatment procedures for cleaning the groundwater disturb the PCBs in the soil?

6A: Groundwater treatment should have no affect on the PCBs because they are inert and bound to the soil. If there are any minute quantities of PCBs found in the water, possibly attached to suspended dirt particles, they will be removed along with the organics and incinerated according to accepted disposal procedures.

MCO 7640188

PCB-ARCH-EXT0371585

7Q: Why did you use PCBs in the first place?

7A: For many years, PCBs were used as heat transfer fluids and to insulate electrical equipment. They proved to have remarkable ~~nonflammable~~ flame resistant properties and in many cases, were the preferred or required material wherever ~~electricity~~ fire risk was used. Use of PCBs undoubtedly saved many lives from injury by fire.

Years ago, Monsanto used PCBs as a heat transfer fluid in one of our processes. By the 1960s, the PCBs became unusable and were landfilled according to industrial disposal practices of the time period. PCBs were not known to be an environmental concern at that time.

8Q: Don't PCBs cause cancer?

8A: I'm not an expert in that area but ~~as I understand,~~ according to published there is no scientific evidence linking ~~PCBs~~ exposure to cancer in humans. If you would like to talk with someone at Monsanto who can answer that question in detail, I'll be glad to arrange that.

9Q; What did you replace them with?

9A: The PCBs in the heat transfer system were replaced with Therminol 66, a widely used industrial heat transfer fluid developed to replace PCBs. Therminol is a safe product when used according to label instructions.

PCB-ARCH-EXT0371586

10Q: How much will this ongoing cleanup project cost the company?

10A: Initial cost will be in the area of $300,000, with ongoing operating costs of $100,000 per year.

11Q: If there are PCBs under the plant, can they get into the plant through cracks in the concrete or foundation material?

11A: PCB molecules are non volatile so they cannot transform into a gas and escape into buildings. Beyond that, they bind tightly to soil and therefore don't move underground.

12Q: Have any employees suffered any harmful effects from having PCBs in the vicinity?

12A: No. Monsanto's environmental health physicians regularly examine employees and review records to detect any abnormalities. As expected, no health problems associated with PCBs have been found. Again, I must emphasize, that on this site, neither the community nor employees are exposed because the PCBs are buried and unlikely to move or dissolve. If you would like more information about the health assessments conducted regularly at this plant, I'll be glad to refer you to our senior occupational medicine physician, Dr. James Spraul.

PCB-ARCH-EXT0371587

13Q: When will the groundwater cleanup actually start?

13A: The equipment and all preparations are expected to be complete by late summer. We expect to begin by this fall.

14Q: When will it be completed?

14A: We estimate the pumping, filtering and treating process to take a few years.

15Q: If you're going to leave the PCBs where they are, how often will you do groundwater testing?

15A: We will conduct a ground water sampling twice a year.

16Q: What will the ground water samplings test for?

16A: The samples will be taken from the shallow baffle drain system to be certain the pumps and filters are effectively removing the organic layer from the groundwater.

MCO 7640191

17Q: How can you be sure that the organic layer won't move to the river?

17A: A 600 foot long baffle drain system will provide a barrier between the area of contaminated water and the river. This system will prevent any possible migration of the organic material from escaping to the river.

PCB-ARCH-EXT0371589

Contingency questions if fine is imposed:

18Q: If you did everything according to the rules, why did the EPA impose a fine?

18A: We feel that the fine is unreasonable and uncalled for. We notified the NJ DEP four days after receiving results of a two year-study we had commissioned through O.H. Materials of Findlay in Ohio. The study identified two separate areas of concern (1) a layer of organic material on the groundwater and (2) ~~also identified~~ the half-acre soil area of the plant where PCBs are confined.

It was known that PCBs used as a heat transfer fluid, were landfilled on plant property in the 1960s when they became unusable in the system. In 1979, Monsanto conducted a clean-up in the area and notified the NJDEP when it excavated and sent the PCB contaminated soil to an approved landfill. We undertook another study in 1984 and as soon as we received the final report from O.H. Materials in Nov., 1986, we notified the NJ DEP, Kearny Mayor Henry Hill, and Kearny Health Officer Ed Grosvenor.

Monsanto feels that it complied with reporting requirements at each phase and therefore the penalty received is unwarranted.

MCO 7640193

19Q: Didn't you know what the reporting requirements of the Spill Act were?

19A: The Spill Compensation and Control Act calls for historical reporting of any incident within 10 days after the incident is known. As Monsanto had notified the state at the time the PCBs were removed in 1979, then again when the site study was completed in 1986, we felt we had complied with all requirements of the Act.

20Q: How much were you fined?

20A: (When and if...$_____ amount)

21Q: Have you ever been fined for a reporting offense at this location before?

21A: No

22Q: Are you going to pay it or fight it?

22A: (To be answered when and if)

MCO 7640194