AEL

Monsanto

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January 15, 1973

United States
Environmental Protection Agency
Region V
1 North Wacker Drive
Chicago, Illinois 60606

Attn: Glenn D. Pratt, Chief
Technical Coordination Section
Enforcement Division

Dear Mr. Pratt:

At the meeting held on December 14, 1972 with Monsanto's representatives Mr. Hume and Park at Federal EPA Headquarters in Chicago you requested specific analytical data. I apologize for not responding more promptly but have been on holiday.

Kindly note on the attached sheet we have posted the average Mercury concentrations and loadings in the plant sewers for September, October and November 1972. For comparison purposes we have also tabulated the Federal EPA results from the September 15-16, 1971 analysis of samples taken by the Federal EPA and forwarded to us on 12/21/72 by Daniel Crevensten. These data are typical of current experience and reflect the trend of improvement achieved. We have also attached another copy of our Plant Sewer Map for your convenience. We continue surveillance and monitoring as was done in 1971.

As per your request we will forward a copy, when available, of the Mercury material balance which Monsanto is preparing as ordered by the Illinois Pollution Control Board.

You also asked for recent test well data for the approved landfill used for disposal of Mercury Sulfide. Working with the Illinois EPA we sampled the four wells on 12/5/72. Our Laboratory's analysis of these wells were as follows:

Test Well	Mercury - parts per billion
1	5
2	4
4	1
5	2

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We have received the Federal EPA results from their 24-hour study of the Sauget Village Sewerage Treatment Plant. In the December Meeting you asked about Monsanto's analyses of these samples. At that time we only analyzed for one parameter; viz. Mercury and did not retain the samples. Our results were 4 µg/l in the Influent and 5 µg/l in the Effluent as compared to the EPA values of 12 and 14. We did compare your results of other parameters with the routine analytical results analyzed by the Sauget Village Treatment Plant people. The December average of several parameters indicate they are in general agreement with the EPA results for these items. For example, results on the following parameters are:

Parameter	Federal EPA Results Influent	Federal EPA Results Effluent	Sauget Village December Average Effluent
pH	2.1	2.1	2.1
BOD	138	134	*
COD	719	607	366
Suspended Solids	357	26	12.4
Total Dissolved Solids	2390	2650	1798
Phenol (µg/l)	5232	5105	5600

*BOD is not routinely analyzed - will average about 100.

We can not evaluate the pesticide analyses furnished Monsanto from the EPA's September 1971 sampling. None of these chemicals are manufactured or used as raw materials at this location. None have ever been produced by Monsanto at this location except DDT and it was discontinued and cleaned out in 1954. We do not analyze for these pesticide parameters and have no knowledge of the background level in the city water and well water entering Sauget Village and our Plant.

We do not classify PCB as a "pesticide". The levels reported in the Federal EPA 9/15-16/71 report and "calculated as Aroclor 1254" appear to be reversed, influent versus effluent. Using the EPA results reported to calculate the loading indicates an amount equivalent to about 0.003 parts per billion in the Mississippi River on an average flow basis which is below the Federal EPA Guideline of 0.01 parts per billion in the receiving body of water. We are controlling at a level that is consistently below the EPA Guideline. The monthly average over the last six months for the total Monsanto manufacturing area was equivalent to 0.0019 parts per billion in the Mississippi River.

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