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Letter to NJ DEP Regarding
Site Study and Remediation
Plan At Kearny Plant

Monsanto is reporting the results of a subsurface investigation in and near the production area at our Kearny, New Jersey plant. The investigation was completed by O.H. Materials of Findlay, Ohio, on November 10, 1986. There is no public health or environmental danger associated with the site; however, results from the investigation indicate two points should be reviewed:

A) EVIDENCE OF ORGANIC MATERIAL FLOATING ON THE GROUNDWATER.

STATUS: There is a layer of organic material similar to our product and raw materials floating on the groundwater. Organic materials have accumulated on top of the groundwater during 30 years of operation. The layer is centered around the production area, with traces extending several hundred feet to the south. Testing verifies that the material has not migrated off the plant site. Testing also indicates only very low levels of dissolved organic material in the groundwater. Our action plan, described below, addresses both the floating organic layer and the groundwater.

MCO 7640208

MS KEARNY LETTER

PCB-ARCH-EXT0371604

ACTION PLAN:

1. Prevention: In 1982, the plant initiated a voluntary program of tank dike upgrading on a priority basis. We have already made operational changes and upgraded many of our secondary spill containment systems. To avoid or minimize the impact of potential product leaks, additional spill containment, curbs, and paving, will be installed.

2. Containment: We will construct a subsurface baffle along the southern boundary of the site to prevent possible migration off the plant site.

3. Removal: The recoverable organic layer will be pumped to a containment area, separated from the ground water, and disposed of via incineration. The resulting water will be used in plant processes and discharged to the POTW in accordance with applicable regulations.

4. Monitor: We will continue to periodically monitor the groundwater to detect any changes.

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B. EVIDENCE OF PCB PRESENCE IN THE SOIL.

STATUS: In the 1960s, PCBs from a process heater in the Alkylphenol unit was landfilled near the process area. Monsanto in 1979 excavated this area (approximately 85 cubic yards) and sent it to a hazardous waste landfill. The manifest sent to the New Jersey DEP cited the presence of PCBs in the material sent to the off-site hazardous waste landfill. In 1983, preliminary studies were conducted to assess the presence of any PCBs remaining after the 1979 cleanup. In 1984, O.H. Materials was hired to conduct a thorough investigation to establish subsurface conditions and the extent of PCBs present and to help define an effective remedial action plan.

OHM's Final Report Indicates:

1) There are measurable quantities of PCBs bound to the soil, and they are confined to the site.

2) The PCBs are present beneath the surface in a 1/2 acre area with depths ranging down to 16 feet maximum (confining peat layer at 16 feet). The majority of the area extends less than 6 - 8 feet in depth.

3) There is no exposure problem. The PCBs are bound to the soil; all of the area is either under the Alkylphenol unit control building, pavement or a gravel layer.

MCO 7640210

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4) In 1984 tests showed very low levels of PCBs in the observation wells. O.H. Materials reports that this was due to the trauma caused by the installation of the wells, resulting in the soil being temporarily suspended in the groundwater. Subsequent tests in 1986 confirmed the "well-trauma" theory.

ACTION PLAN:

1. Prevention: All PCB transformers have been removed from the plant; there is no longer any potential source of PCBs in use at the site.

2) Containment: The PCBs are below the surface and are effectively capped. In addition, PCBs are bound to the soil and are immobile. There is no exposure to the employees or the community. Therefore, there is no need at this time to institute any additional containment system.

3) Removal: There is no public health or environmental danger associated with the site because of the significantly low, if any, risk of exposure to the PCBs. At this time, there is no compelling reason to remove any PCB-contaminated soil. The removal of the subsurface PCB-contaminated soil has more risk associated with it than leaving it in place, since it is effectively capped and contained.

4) Monitor: We will monitor the existing wells to detect any possible migration. As the floating organic material is removed, we will also periodically test the associated groundwater for presence of PCBs.

We are submitting this information in the spirit of cooperation and intend to work with the New Jersey DEP to ensure that the environment is protected.

William J. Boyle, Jr.
Plant Manager

MCO 7640212

MS KEARNY LETTER

PCB-ARCH-EXT0371608