



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604



JAN 11 1977

Mr. Phocion S. Park
Environmental Counsel
Monsanto Company
800 N. Linbergh Boulevard
St. Louis, Missouri 63166

Dear Mr. Park:

As you are aware, the proposed NPDES permit (copy attached) for the Village of Sauget is being prepared for public notice and is set for public hearing on February 14, 1977. In light of past discussions between the U.S. Environmental Protection Agency and the Monsanto Company, and of the fact that the Monsanto William G. Krummrich plant is the principal discharger of industrial waste and polychlorinated biphenyls (PCB's) into the Sauget treatment system, I would like to take this opportunity to recapitulate the plans Monsanto has stated it intends to carry out concerning the PCB discharge. Further, before the hearing, I would like to solicit your comments with respect to these and other provisions that will be incorporated into Sauget's proposed permit.

Monsanto has stated its intention to cease production of PCB's entirely by August 31, 1977, and to dismantle the PCB production facility thereafter. The Company has also stated its willingness to dispose of any contaminated equipment resulting from the dismantling in scientific landfills, and to eliminate the distribution of PCB's by October 31, 1977. Additionally, Monsanto has indicated it will perform a monitoring program of both its own and the Village of Sauget's influents and effluents in order to determine the impact of the Company's PCB discharge elimination program. Lastly, Monsanto has said it will analyze any remaining PCB discharge to determine its magnitude and which, if any, further remedial measures should be undertaken to reduce the discharge after production has ceased and after Sauget's new sewage treatment plant has become operational.

The Permit as proposed for the Village of Sauget recites the above plans and, at pages 9-11, further provides that Monsanto shall continue its present practices of limiting PCB spills and of vacuuming the sumps in the sewer line leading from PCB production facilities. In addition, Monsanto and the Village shall conduct a monitoring program to include a weekly sampling of Monsanto's incinerator and combined discharges, as well as such other sampling as needed in implementing the PCB discharge elimination program. Any further sampling necessary to determine the existence of contaminated sewers or runoff areas will be conducted by Monsanto and Sauget. No later than December 31, 1977, a summary of monitoring data and a report on the success in achieving a final limitation of zero PCB discharge shall be submitted. Further, Sauget and Monsanto shall

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determine the physical integrity of the sewers transporting PCB production wastes to the Sauget treatment plant. Finally, a biological monitoring program shall be executed to establish the toxicity of and probable bioaccumulation due to the effluent from Sauget, and an analysis shall be conducted to define what chemical contaminants are present in the Sauget effluent after May 1, 1977, including the presence or absence of the 65 chemical parameters set out in the NRDC Settlement Agreement (D.D.C., 1976).

I have been pleased to note Monsanto's willingness to enter into the program for eliminating the production and discharge of PCB's, and look forward both to hearing from you regarding Monsanto's comments on the proposed permit before the February 14, hearing and to continuing to work with you in the control of water pollution.

Very truly yours,

A. H. Manzardo
A.H. Manzardo, Chief
Permit Branch

Enclosure

cc: Mr. Richard J. Kissel
Martin, Craig, Chester and Sonnenschein

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