Monsanto

PCB's

FROM (NAME & LOCATION): F. J. Basile, Jr. - WGK

DATE: February 18, 1977

SUBJECT: EVANS STEEL BARREL CO.

REFERENCE:

E. Campbell
W. Gallagher
A. Gallion
P. E. Heisler
R. G. Moody
C. Sullivan

TO: E. R. Billen

We will begin our efforts on Monday, February 21, 1977, to remove approximately 1,400 waste Aroclor drums from the premises of Evans Steel Barrel Co. for disposal at the SCA Industry Earthline Division's Class I Hazardous Waste Landfill in Wilsonville, Illinois. The arrangements we have made and the procedures we will operate under are as follows:

Personnel

- Project coordinators	Frank Basile Bob Moody
- Observer at Evans	Bill Gallagher
- Observer at Earthline	Neil Sullivan
- Earthline representatives	Walt Watson Virginia

Transportation

- Trash boxes and transport vehicles will be provided by United Disposal, also an SCA subsidiary. All transportation is to be coordinated through Earthline. For coordination or for any problems, arrangements have been made with Earthline to accept collect telephone calls from either Bill Gallagher or Bob Moody. Earthline's coordinator is the site secretary, Virginia, and the telephone number is:

  Area Code 217-835-2931 or 835-4395

  If there is any difficulty contacting Virginia, call United Disposal direct in St. Louis at 241-3710. The contacts there will be Jim Walla or Ron Ross.

- Arrangements have been made for one empty trash box to be dropped at Evans on Friday, February 18, 1977, so that work can commence at 8:00 a.m. on Monday, February 21, 1977.

Labor

- Three laborers will be provided at Evans by W. R. Montgomery and Associates, Mechanical Contractors. These men will have a straw boss among themselves and they will be under the direct supervision of a member of Evans' salaried workforce. Bill Gallagher is to be only an observer and is not to become involved in supervision. In the event that Bill sees anything improper or unsafe taking place, he will take action through Evans' supervisor. Bob Moody will brief everyone on these arrangements before work commences at Evans.

Safety

- At all times, good judgment and safe work practices must be exercised by all individuals involved, but especially at Evans as the huge drum pile is dismantled. This is top priority. Bob Moody will brief everyone on this subject before work commences at Evans.

Procedure

- As drums are manually dismantled from the drum pile, each drum must be stenciled with Earthline's identifying code number, 01-21, and counted. Drums that Evans has on hand are both dark and light colored. Therefore, both light and dark paint should be available for the stenciling. Bill Gallagher will be responsible for obtaining a supply of paint, paint brushes, and rags for stenciling.

- After being stenciled, the drums are to be manually loaded into the trash box.

- As a trash box approaches being full, contact Virginia at Earthline for removal. When the truck arrives at Evans, the driver should move the full trash box and set it down out of the way, replace it with an empty trash box, and reload the full trash box for transportation to Earthline.

- Prior to departure, the truck driver is to be given a bill of lading, indicating the exact number of drums in the trash box, and signed by Bill Gallagher. Bill Gallagher will be responsible for having bill of lading forms on hand.

E. R. Billen
Evans Steel Barrel Co.

Procedure (Cont'd)

- Neil Sullivan will commute daily to Earthline for the purpose of observing the drum disposal.

- When the truck arrives at Earthline, Neil will observe the drum unloading, verify the drum count as shown on the bill of lading, and witness the crushing of the drums. After the drums in a load are destroyed, Neil and a representative from Earthline are both to sign on the bill of lading certifying the destruction. At the end of the day, Neil is to retain one copy of the bill of lading that has his, Bill Gallagher's and the Earthline representative's signatures on it. Ultimately, these signed copies will be submitted to MIC's legal department as per Bob Pohl's directive. When not observing the disposal of Monsanto's drums, Neil is to remain in a location designated by the Earthline site management.

Timing

- While we will begin on Monday, February 21, 1977, the timing for completing this endeavor is unknown. Assuming the estimate of 1,400 drums to be a good one, it may take as long as a week to complete the disposal of the drums. That time period will vary, of course, depending on the actual number of drums or any problem that may be encountered.

Contacts

In the event of any problem at Evans or Earthline, Bill or Neil should contact either myself or Bob Moody immediately.

Frank J. Basile, Jr.
Frank J. Basile, Jr.

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