

2-8-82

P.G. Potter,

FEB 9 1982

We have heard
nothing to-date.

Tomorrow - 2-9-82 -
plant will contact
Illinois EPA to
reestablish dialogue.
I'll let you know of
their reaction.

KW-
Held for
response - JH
Tapagay

CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER.

004628

Monsanto

FROM
(NAME-LOCATION-PHONE)

J. J. Spano - G4NH - 4-8654

DATE : February 3, 1982

SUBJECT : FEB 4 1982

REFERENCE :

TO : Messrs. J. W. Molloy - 1740
W. B. Papageorge - G4WA
W. W. Varnado - G4NE

cc: R. G. Potter - G4NH
D. R. Bishop - A3NB
J. F. Hussey/G. D. Ingenthron - A3NB
P. S. Park - E2NE
G. J. Levinskas - G2WF
R. L. Biggerstaff - F3EB
S. G. Collins - A3NC
H. W. Curtis - 1740
M. F. Weishaar - G4WA

WJB Papageorge
What goes with the
Feb 4?
JB

Attached is the updated version of our Q&A list re the Mississippi riverbank seepage.

Our public stance looks better as more information is developed and, in turn, is incorporated into our Q&As. The big question remains: what, if anything, does Monsanto propose to do to stop or ameliorate the situation?


John J. Spano

dt

Attachment

UPDATE OF WGK RIVERBANK SEEPAGE Q&A

- 1Q. I UNDERSTAND THAT THE EPA IS INVESTIGATING SEEPAGE FROM THE BANKS OF THE MISSISSIPPI RIVER IN SAUGET, ILL., WHICH IS OCCURRING ON MONSANTO PROPERTY. WHAT IS THIS ALL ABOUT?
- A. Representatives of the U.S. EPA and the Illinois EPA, accompanied by WGK plant environmental control staff, were at the western boundary of Monsanto's W. G. Krummrich plant property at the Mississippi River bank last November 12. They were taking samples of seepage from the east bank of the Mississippi River just south of Monsanto's river terminal.
- 2Q. WHAT'S THE PROBLEM THERE?
- A. The EPA personnel said they are concerned about the possibility that pollutants may be leaching into the river. They took samples which will be analyzed by EPA and contract laboratories to determine if any pollutants are present, and if so, in what amount. They told us we would receive results of the laboratory tests.
- 3Q. HOW CLOSE IS THE SEEPAGE FROM THE OLD KRUMMRICH LANDFILL?
- A. About 200 feet.
- 4Q. WHAT IS THE HISTORY OF THAT LANDFILL?
- A. The landfill occupied 15 acres of a 22-acre company-owned tract south of the plant's Mississippi River terminal. It was operated by the company from 1958 to 1978 in compliance with all laws and regulations in existence at that time. After it was closed, the landfill was covered with a cap of low-permeability clay.
- 5Q. IS THERE A POSSIBILITY THAT THE OLD LANDFILL IS THE SOURCE OF THE SEEPAGE?
- A. Yes, it is possible because of the proximity of the old landfill in relation to the location of the seepage. I must emphasize, however, that there has been no determination that the landfill is the source. There are several other possibilities, including the natural flow of an aquifer, the recharging of the groundwater by the rise and fall of the river or by rainwater.
- 6Q. WHAT ARE YOU DOING ABOUT THE SEEPAGE THE EPA IS INVESTIGATING?
- A. Monsanto personnel accompanied the EPA personnel while they obtained samples. EPA gave Monsanto portions of these samples for analysis by a Monsanto laboratory. The samples have been analyzed by Monsanto's Dayton Environmental Analytical Sciences Center to determine if there are significant levels of pollutant present.

Monsanto is also conducting a hydrogeological study in an attempt to determine the source of the seepage, and the transport mechanism. We also sampled the river. Based on the final results of these studies, appropriate remedial action will be taken.

7Q. WHEN WILL YOU HAVE THE TEST RESULTS?

A. We have the results of the samples that EPA shared with us. The river water sample analysis has been completed, and we are waiting for a final report from the laboratory.

8Q. WHAT SPECIFICALLY DID THE ANALYSIS OF THE SEEPAGE SAMPLES SHOW?

A. We analyzed for a variety of chemical materials. Generally, the concentrations are in the part per billion range.

9Q. CAN YOU NAME OR IDENTIFY ANY CHEMICALS--JUST WHAT DID YOU FIND?

A. Various chlorine, benzene and phenol compounds were identified in very small concentrations.

10Q. CAN WE HAVE A COPY OF THE SEEPAGE CHEMICAL ANALYSIS?

A. The analytical procedures used are highly sophisticated and interpretation of the results extremely difficult. We do not plan to share the report with anyone other than the appropriate representative of the state and Federal EPA.

11Q. WHAT WERE THE RESULTS OF YOUR ANALYSIS OF THE SAMPLES OF THE WATER TAKEN FROM THE MISSISSIPPI RIVER?

A. Samples were taken upriver and downriver from the location of the seepage. Our analysis so far has indicated that there was no significant difference between the upriver and downriver samples.

12Q. DOES MONSANTO FEEL THERE COULD BE ANY DANGER TO HEALTH OR THE ENVIRONMENT IN RELATION TO THE SEEPAGE AND OTHER POSSIBLE CONSEQUENCES OF THE SITUATION?

A. Based on the data reviewed to date, no intolerable (chemical) levels are anticipated in drinking water.

13Q. WHAT DO YOU BASE YOUR CONCLUSION ON?

A. This is mainly based on the river water sample analyses, in which we found that there was no significant difference between the upriver and downriver samples.

14Q. DID YOU ANALYZE FOR DIOXINS AND PCBs?

A. There were no dioxins or PCBs found in the river samples. Extremely low levels of dioxins at or near the detection limit in the low ppt (part per trillion) range were found in the seepage samples.

15Q. DO YOU CONSIDER DIOXINS AND PCBs A PROBLEM?

A. Because of the extremely low levels in seepage samples and the difficulty encountered in analytical procedures at these levels, we are rechecking the data before we make any further comment, except to emphasize that no dioxins or PCBs were found in the river samples.

- 16Q. ARE TOXIC CHEMICALS PRESENT IN THE OLD MONSANTO LANDFILL?
- A. Some materials placed in the site would be classified today as toxic. Landfilling of toxic materials at the site was stopped in 1974. After that time, until its closing in 1978, the landfill accepted only solid, non-toxic chemical wastes and common refuse, such as fly ash, cinders, building rubble, etc.
- 17Q. HOW MUCH WASTE MATERIAL IS BURIED AT THE SITE?
- A. Our best estimate is about 290,000 tons.
- 18Q. WHAT KINDS OF TOXIC CHEMICALS ARE BURIED THERE?
- A. The landfill contains various quantities of a wide range of chemical wastes.
- 19Q. ARE PCBs BURIED IN THE LANDFILL?
- A. Yes, limited amounts.
- 20Q. DOES THE LANDFILL CONTAIN DIOXINS?
- A. Due to the ubiquitous nature of dioxin, it is possible small amounts are present. To the best of our knowledge, no dioxin was placed in the landfill.
- 21Q. IS THERE A POSSIBILITY OF WASTE LEACHING INTO UNDERGROUND DRINKING WATER SUPPLIES?
- A. Not in our opinion.
- 22Q. IS THERE A POSSIBILITY OF A "LOVE CANAL" TYPE SITUATION HERE IN ST. LOUIS?
- A. No, we don't think so. There are no residences nearby; the nearest is about a mile away. And, the Love Canal situation involved sale and subsequent development for residential purposes of land containing a chemical waste landfill. We have no intention of selling the site.
- 23Q. CAN FLOODING OR HIGH WATER CREATE LEACHING PROBLEMS?
- A. Because of the higher elevation of the closed landfill, a river stage such as the 1973 flood of 43.3 feet, highest in memory, would not cause flooding of the closed landfill.
- 24Q. DID YOU SEEK PROFESSIONAL ADVICE ON THE LANDFILL?
- A. Yes, we contracted with the consulting firm of D'Appoliana Consulting Engineers, Inc., and implemented their recommended course of action in closing and capping the landfill.
- 25Q. HAS THE EPA EVER INSPECTED THE LANDFILL BEFORE THE NOVEMBER 12 INSPECTION?
- A. Yes, the Federal EPA has inspected it once and the Illinois EPA has inspected it several times.

26Q. WHAT WERE THE RESULTS OF THE EPA INSPECTIONS?

A. We have not been told of any problems.

27Q. WHAT TYPE OF TESTING HAS BEEN DONE BY THE EPA?

A. On two occasions, water samples were taken from monitoring wells near the landfill and analyzed for contamination; and on another occasion, resistivity tests were conducted at the landfill.

28Q. DO YOU HAVE SPECIFIC RESULTS FROM YOUR OWN WATER SAMPLE TESTING AT THE LANDFILL?

A. We only know that the water samples indicated minute traces of chemicals in the landfill. At this point, we do not know the specific results of the resistivity tests.

29Q. HAVE YOU DETECTED ANY MERCURY, PCBs OR DIOXINS IN THE WATER?

A. We have not detected mercury. We have found ultra trace indications of PCBs (ppb) and dioxin (ppt).

30Q. WHAT OTHER CHEMICALS WERE FOUND IN THE WATER SAMPLES?

A. There were indications of the presence of phenol and other organic chemicals.

31Q. IS THERE ANY LEACHING FROM THE LANDFILL?

A. Our monitoring program to date has not detected any leaching.

32Q. IS THE LANDFILL STABLE, AND IF SO, DO YOU FEEL IT WILL REMAIN IN A STABLE STATE?

A. To the best of our knowledge, the landfill has remained stable.

33Q. WHERE IS THE PLANT WASTE DISPOSED OF NOW?

A. Wastes are now disposed in a contract landfill in Sheffield, Illinois, and by contract incineration in Louisiana and Texas.

34Q. HAVE YOU EVER CONSIDERED BUILDING YOUR OWN INCINERATOR?

A. Presently an incinerator is under evaluation, as well as other alternatives.