Monsanto

B/U-10/15

FROM (NAME & LOCATION): Paul B. Hodges - E1SF General Offices

DATE: September 24, 1973

SUBJECT: BACKGROUND PCB LEVELS

REFERENCE:

TO: P. E. Heisler - 1740
G. A. Hippe - 1740

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On September 7, 1973 EPA published their first "List of Toxic Pollutants". This list had been, according to the Federal Water Law PL 92-500, due last June but EPA has not been meeting all of the deadlines imposed in 92-500. Following a suit by an environmental group, EPA entered into a consent decree to publish proposed effluent standards for the toxic pollutants by December 3, 1973. Within the following 90 days, they then will promulgate the effluent standards and will set a time for compliance, not to exceed three years.

PCB's were, of course, on the list. We do not yet know what the limitations will be but will do everything reasonable to help obtain workable limitations. However, we can realistically expect a limitation of less than 1 lb/day from our entire plant.

With successful implementation of the present PCB's reduction program, we should be able to maintain a discharge of less than 0.5 lb/day from the producing department and incinerator and this may represent adequate control. However, some place within the plant or Village sewer system, we are picking up 6-8 lbs/day additional as measured in the influent to the waste treatment plant. This amount of "background" loss far exceeds any allowance we or the Village are likely to obtain.

Near-elimination of the background loss will be very difficult technically and may be very expensive to accomplish once we know where it originates and what to do about it. Purpose of this letter is to urge the plant to commence a program of monitoring to determine sources of the background loss. With departmental losses under improved control, we are in better shape to define our problems than we were a year or so ago when departmental losses were much larger

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as compared to background losses. The monitoring work should commence promptly in order to allow maximum time for correction. Also, if obtained soon enough, the information may assist in the work with EPA in trying to obtain reasonable effluent limitations.

Your comments will be appreciated.

Paul

Paul B. Hodges

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