Monsanto

FROM (NAME & LOCATION) J. C. Hume - Krummrich

DATE: December 19, 1972

SUBJECT: Meeting 12/14 with Federal EPA

REFERENCE:

TO: G. L. Bratsch
H. C. Carder - GO

cc: R. M. Blowers
P. E. Heisler
[redacted]
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This memo is to summarize the meeting held in Chicago, Illinois at Federal EPA headquarters December 14, 1972. Mr. Walter Romanek of the Federal EPA had requested testimony from Monsanto on mercury losses at the December 6, 1972 hearing at Collinsville. When time precluded this testimony at the hearing Mr. Romanek requested the meeting in Chicago.

In attendance at the meeting were:

Federal EPA
Glenn Pratt - Enforcement Division
Dan Crevensten - " "
Walter Romanek - " " (about 15 minutes)

Illinois EPA
Robert Schleuger

Monsanto
Jack Hume
Phocian Park

As we were introducing ourselves surprise was expressed by Mr. Pratt and Mr. Schleuger that the familiar faces from the meetings of 1971 were not present. In particular they were surprised that Paul Heisler was not present since he signed all the monthly reports to the state.

Mr. Romanek was not in the meeting at the beginning, and as indicated was only in attendance about 15 minutes. Just long enough to ask 2 or 3 questions. Mr. Pratt ran the entire meeting, with a few comments from Mr. Schleuger and essentially no questions or comments from Mr. Crevensten.

Almost the first question asked by Mr. Pratt was how are PCB discharges going these days. I told him I knew PCB's were being monitored but as this was not in my area of responsibility I did not know the numbers. He asked for them to be sent to him. He commented he had heard we had had permit trouble on the PCB incincerator and wanted to know how that was coming. He was told we understood there were some permit delays but the incinerator was operating regularly now. Mr. Pratt asked if the incinerator was strictly for liquids, or would handle materials such as NCR's carbon paper. I indicated it was not an official answer but I was certain that the incinerator was designed for liquid only.

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At the beginning of discussions on mercury, Mr. Pratt indicated a desire to discuss specific analytical results from individual plant sewer boxes, as was done in 1971. They were told we did not come with all this information, and Mr. Pratt asked that it be sent. They were told that typical numbers might show 0.05 lbs. per day from Area 3 in the plant, and 0.05 lbs. per day from Areas 1 and 2 combined. Mr. Pratt pointed out that this is not much different from the results they saw in 1971, which is true.

Mr. Pratt indicated that he was concerned about indicated increases in total mercury discharge in recent months. We discussed the plant and chlor-alkali totals, as reported to the state monthly. These numbers showed 0.25, 0.28, and 0.31 for the past three months, which are not a significant increase over early in the year(first 6 months average 0.33). We discussed the 0.55 total(0.05 from chlor-alkali) for the month of August, and the reason which was a bathtub overflow. Mr. Pratt indicated he was not concerned about the unusual circumstance such as this, but the regular discharge without extenuating circumstanc The effect of rainfall on the total plant discharge was discussed at length, and recognized as a contributor. Mr. Romanek commented that of course part of this was contributed by mercury to the air from chlor-alkali, and ask what this number was. I indicated that by the measurements we do make we are within the proposed Federal guideline of 5.1 lbs/day. Note - this guideline includes an assumption of 3 lbs/day from the cell house, and not an absolute measurement.

Further in the area of plantwide discharge control, Mr. Pratt recalled that in the 1971 meetings it was indicated that the plugging of the sewer between sewer box 4-F and 3-G would solve the problem in Area 3. He commented that obviously it did not, and evidently Monsanto was too optimistic in how fast mercury deposits in the sewer would diminish. He reported knowing of sewers that still showed a mercury discharge after 6 years of no mercury influent. He said perhaps Monsanto should abandon and replace mercury bearing sewers. This was not persued.

Following further discussion of the various programs the plant had followed, and was following relative to mercury discharge "other than chlor-alkali" Mr. Romanek asked if any of the mercury bearing discharges from the rest of the plant could be sent to the chlor-alkali bathtub and treated. He was told that since all of these streams were below the solubility of HgS that treating them would raise rather than lower total discharge. He understood and accepted this answer.

We discussed for a few mintues the work and results in the chlor-alkal treatment system. They were not that concerned about chlor-alkali at this time. Mr. Pratt even volunteered that while probably some improvements could be made further in chlor-alkali through the years that this would have little impact on the total plant problem. They did not accept the concept we tried to present that the 100+ acre "rest of plant" is really no different from every other large chemical complex. Mr. Pratt said that even with chlor-alkali treatment under control they still felt the major contribution from the rest of plant was still leftovers from chlor-alkali.

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Meeting 12/14 with Federal EPA — 12/19/72
WGK

In the testimony presented at the Federal EPA hearing in Collinsville December 6 there was a report of analyses of influent and effluent from the Sauget Village Treatment Plant from samples taken 9/20 and 21/72. These Federal analyses showed the mercury level at 12 ppb in and 14 ppb out. It was pointed out that Monsanto's analysis on a share of the same sample was 4 ppb and 5 ppb out. They ask for us to send Monsanto's results on all the other items analyzed on these samples(COD, BOD, solids, phenols, etc). They also indicated they would recheck their analysis. At this time they also referred to a list of Federal analysis from the Sauget plant on samples taken September 15 and 16, 1971. These were mainly on pesticides(copy attached). Mr. Pratt requested we send whatever recent information we have on these pesticides. They were told we no longer have any such operations, and probably have no analyses but we will check and see.

We discussed the statement in the Federal hearing that Monsanto had agreed in 1971 to achieve 1/4 lb/day total output of mercury. We told Mr. Pratt that Monsanto's agreement at that time of pre-neutralization of our treated waste stream, and we were targeting 0.18 lb per day from chlor-alkali and committed to 1/4 lb per day maximum from chlor-alkali - not from the total plant. Mr. Pratt ask if Monsanto did not understand that the Federal request was for 1/4 lb total plant. We said yes Monsanto knew the Federal EPA was requesting 1/4 lb/day, but we thought it had been made clear in the 1971 meetings that Monsanto was targeting 0.38 lbs per day(0.18 chlor-alkali, 0.20 rest of plant) and did not know how to get to 1/4 lb total. We indicated that while we had been at 1/4 lb or less several months, that due to the many unknowns, such as rainfall, we still did not know how to assure 1/4 lb or less all the time.

Mr. Pratt asked what was the present disposition of the mercury sulfide. He was told it was going to the landfill. He requested that we send recent information on mercury in our test well monitoring. He said also, that in 1971 he was told that recovery of the mercury from this HgS, rather than landfilling, would be coming. He was told that this looked promising in 1971, but no practical method for mercury recovery from mercury sulfide had been developed.

Near the closing of the session Mr. Pratt ask who Monsanto's PCB customers were in the Cleveland/Akron area. He indicated they were getting high PCB readings in the rivers in this area and wanted a list of customers mailed to them so they could check it further.

The meeting ended without any request for further meetings, and without any request for targets or commitments - just encouragement to continue work on improving total discharge.

Recap of the data requested for Mr. Pratt and Mr. Schleuger is as follows:

1. Recent summation of mercury data from sewers in the plantwide areas.
2. Recent mercury data from test well monitoring.
3. Recent test data on pesticides from Sauget treatment plant.

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4. Copy of Monsanto's total analyses from Sauget treatment plant 9/20 and 21/72.
5. Updated data on PCB discharges.
6. List of PCB customers in the Cleveland/Akron area.

Paul Heisler at WGK will coordinate the collection and mailing of the first five items, and Phocian Park will handle our answer on No. 6.

Jack Hume

J. C. Hume

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Attachment

DSW 310813