

Monsanto

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INA : LOCATION - PHONES

DATE : June 3, 1981
SUBJECT : Monthly Report
May 1981
REFERENCE :
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HIGHLIGHTS

Texas City Well Permits

Permit application WDW-196 and Amendment WDW-91 was approved at the May 18 meeting of the Texas Water Commission. Next step now is to get EPA Region IV to agree with our RCRA interim status determination on the RCRA Part "A" Permit.

EPA Inquiry on MOTCO, French Limited, Sikes Pit Disposal Sites - Texas City/Chocolate Bayou

Both plant sites have received another EPA inquiry about Monsanto's use of the three disposal sites in question. Monsanto did dispose of material at the MOTCO site. It looks as if EPA is trying to build a case for future litigation. Reply to EPA will be forwarded in early June. (A rough estimate of \$40M has been thrown out as a clean up cost for the MOTCO site alone.) Environmental Law is coordinating issue with the Texas Chemical Council and others who have received similar inquiries. Final strategy meeting is planned for June 9.

PCB Legislation - Texas

A bill has been introduced in the Texas House and Senate to ban the incineration and emission of polychlorinated biphenyls currently permitted at the Rollins Deer Park, Texas facility. Issue is being followed by EPA and Corporate PCB spokesman and Texas Legislative contact.

Area Incinerator

Area incinerator pre-project board met on 5/11/81. Latest estimate for AR submittal to the Monsanto Board of Directors is now September. Problems remain with evaluation of economics of waste heat recovery boiler. Federal PSD permit will expire 1st quarter 1982 unless project is approved and construction starts by then.

CONFIDENTIAL

C07317

19

June 3, 1981

SUMMARIES1. Objective

Coordinate and provide input to MCI programs to ensure compliance with corporate and regulatory OSHA/EPA guidelines and regulations.

Status

Pensacola Butane/Maleic Project - A memo to Region IV EPA detailing Monsanto's understanding of certain permit language has been delayed due to several rewrites by the plant. Plans are to complete and file the memo of understanding by mid-June.

The existing temporary operation permit (TOP) for the Pensacola deep well was reviewed on 5/6 with Environmental Law and Pensacola plant personnel. Existing TOP expires 6/1/81 with a request for a one year extension filed 3/81. Authority to discharge the future butane/maleic wastewaters into the deep well under the existing permit was discussed in detail. Environmental Law will prepare a legal opinion on this matter in light of existing deep well regulations and future RCRA underground injection requirements.

RCRA Chlor-Alkali Brine Mud Delisting - A memo detailing the results of Monsanto's plant scale brine mud leaching and washing tests was sent to the Chlorine Institute on May 13, 1981. These results which show mercury levels at 1/10 of the EP toxicity procedure will be used in the drafting of a performance based standard for delisting of the brine muds.

Columbia Screening Plant - The evaporative nodule cooling experimental project has completed its second scheduled four week cooling period using water sprays to cool the nodules. Preliminary results of the test indicate that (1) no adverse effects to phosphorus production have been attributed to evaporative nodule cooling; (2) nodule dust levels have decreased in the nodule craneway and nodule conveyor area, and (3) the reduction in furnace feed temperature will prolong the stocking system belts. Completion of all tests is set for July 1981.

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Columbia NPDES Permit - An extension of time until 6/25/81 was received for comment on the Columbia NPDES permit from Tennessee. Plant environmental is drafting a compliance schedule for needed changes to the treated water solids disposal system estimated at \$30k capital and a narrative on the operation and management of the process ponds which results in high suspended solids due to algae.

CONFIDENTIAL

C07318

June 3, 1981

1. (Continued)

Draft comments were completed for the pH and total suspended solids (TSS) limitations of the Columbia NPDES permit. Algae in the raw water intake (Duck River) contributes to violations of the proposed pH and TSS permit conditions. A meeting has been set with the State of Tennessee Division of Water Quality Control to review the draft permit on June 25, 1981.

ACL Pre-Treatment - The pre-project Environmental control review was completed on CEA 3471 ACL Waste Water Pre-treatment. The project will reduce ambient air Cl_2 concentration at the Sauget treatment plant to below a 1 ppm ceiling, reduce atmospheric emissions of Cl_2 from ex-ACL battery limit sewer boxes; and prevent the possibility of a bug kill in the Regional Waste treatment plant planned for 1983.

NPDES Permit Texas City/Chocolate Bayou - Supplemental National Pollution Discharge Elimination System (NPDES) permit data was received from Chocolate Bayou and Texas City detailing a complete priority pollutant analysis on treated process and non-process outfalls. With submission of the data an attempt will be made to seek relief from several parameter limitations in the Texas City permit. Completion of all reviews and signature by C. P. Cunningham will meet the June 30 filing deadline.

2. Objective

Assure that MCI products continue to be acceptable in terms of user safety and environmental impact.

Status

A change in Product Acceptability Guideline No. 9 "Outside Processors" was proposed to MCI General Managers. The change would include scrap materials sold for salvage value in the scope of Guideline No. 9. These materials will be sold only to contractors capable of protecting their workers and the environment.

3. Objective

Expedite the responsible completion of the CMA sponsored benzene epidemiology study.

Status

Tabershaw Occupational Medical Associates (TOMA) stopped effort on this project mid-February pleading higher than anticipated costs to complete the study. A meeting was held with Dr. Tabershaw 3/3/81 to attempt resolution of this situation. TOMA, April 23, provided an estimate of \$101k to complete the study, but via a less satisfactory protocol. Biometric Research Institute (BRI), mid-April, provided an estimate of \$63k to complete the study, but this cost has been revised upwards to \$90-100k when modified to more nearly match the original protocol. BRI has the advantage of having three former TOMA employees who accounted for most of the TOMA effort on this project through

C07319

June 3, 1981

3. (Continued)

3Q 1980. Termination of the TOMA contract in favor of BRI received approval of the CMA Benzene Program Panel mid-May. Details of recovery of data from TOMA and execution of a CMA/BRI contract may not be complete until mid-June. Study completion following contracting with BRI is estimated 6 months.

4. Objective

To minimize toxicity testing costs by engaging in jointly sponsored projects where appropriate.

Status

Studies of benzene are jointly sponsored by CMA and API; chlorobenzene studies are sponsored by CMA. MCI is a participant in both.

A 90 day inhalation study (rats and mice) of dicylopentadiene contracted by Exxon, is being sponsored by five companies including Monsanto. After two weeks of exposure some abnormal kidney functions were observed in the male rat. Exxon made an 8(e) notice to the EPA. Toxicologist participants reviewed the draft final report May 7. Assessment of need for further testing is under consideration.

IISRP oncogenic testing of butadiene exposure is complete, but the pathology is not complete. Exxon, a participant, has made an 8(e) notice to EPA based on observed effects at exposures of 8000 ppm and possible effects at exposures of 1000 ppm. Conclusions from the study are expected 3Q 1981.

Joint testing of ketones under CMA sponsorship will start with MIBK. Because of lack of data on acetone, CMA requested bids on testing acetone in parallel with MIBK and contacted all major producers to solicit their interest in sponsoring a sub-chronic testing program. The caprolactam producers have agreed to make cyclohexanone a candidate for testing in their program with the Industrial Health Foundation (IHF). U.C.C. and Monsanto were invited to an IHF meeting, 4/21/81, to organize a cyclohexanone testing program and a plan for interfacing with the regulatory agencies.

Follow up on each of these programs is scheduled at a meeting of the IHF cyclohexanone participants, 6/5/81.

DMEH completed an updating of the status of toxicity information on naphthalene. Subsequently the National Toxicology Program announced a plan for limited naphthalene testing. Pending NTP plan approval, the advisability of an industry testing program will remain under study.

Joint testing of methanol and mercury previously considered dead issues are being reconsidered by SOCMA and the Chlorine Institute respectively. Potential for either establishing sufficient interest continues low.

CONFIDENTIAL

C07320

June 3, 1981

5. Objective

To determine if employees exposed to chlorophenols exhibit any signs of adverse health or dermal effects in comparison to those not so exposed.

Status

A team under the direction of Dr. Suskind made a thorough study, stating October 1979, to identify any chloracne or other biological indicators among penta and chlorophenol exposed workers at the W. G. Krummrich plant. A preliminary report of the study, 9/80, confirmed chloracne from penta exposure but was not definitive for exposure to the lower chlorophenols. Efforts of DMEH to extract a final report from Dr. Suskind continue. He failed to meet his mid-May deadline to deliver a final report on the Nitro study which preceded the W. G. Krummrich study.

NIOSH (P.A. Honchar, Ph.D.) submitted a request in March to DMEH for access to personnel and medical records of W. G. Krummrich, J. F. Queeny and Nitro workers who may have been exposed to dioxin isomer contaminated materials, such as: 2,4,5-T acids and esters; 2,4,5 trichlorophenol; or pentachlorophenol. Honchar visited the general offices May 4 for a discussion of how to meet NIOSH's needs while avoiding unnecessary interferences at the plants. Some legal safeguards and an appropriate study protocol have not yet been resolved.

6. Objective

Influence and manage programs within MCI to ensure compliance with regulatory and corporate environmental guidelines.

Status

Rock Springs - Solid Waste Disposal Permit - MCI Environmental Operations and Environmental Law have reviewed the directive from the Wyoming Department of Environmental Quality. Recommended to the plant to request a waiver from the permit requirements because of the remoteness of the plant and the fact that the coke plant fines are being used to reclaim the old strip mine areas. The Wyoming Department of Environmental Quality has responded verbally to the plant's request for waiver from filing for a solid waste permit requirement stating that the department is no longer giving waivers. Department personnel are going to visit the site next week. We are claiming the coke fines are a by-product material, we are not really disposing of the material but storing pending potential sale. Sale to kiln operator in Utah is still under negotiation.

CONFIDENTIAL

C07321

June 3, 1981

6. (Continued)

Texas City Well Permits - Permit application WDW-196 and Amendment WDW-91 was approved at the May 18 meeting of the Texas Water Commission. Next step now is to get EPA Region VI to agree with our RCRA interim status determination on the RCRA Part "A" Permit.

7. Objective

Assure proper disposal and fate of solid wastes generated at MCI sites.

Status

Avon - 67 Abandoned Hazardous Waste Disposal Sites - The Avon plant has been listed as one of the target sites for Superfund clean up in a recent report issued by the California Department of Health Services. Classifying the site as an abandoned site is incorrect. Environmental Operations is following this issue with the plant.

Hazardous Waste Disposal Contractor Inspections - Recommendations were made to Texas City plant that the EMPAK and Malone Service Company sites be re-inspected prior to any further contract negotiations. Also advised the Avon plant that the IT Corporation disposal site be inspected.

EPA Inquiry on MOTCO French Limited, Sikes Pit Disposal Sites - Texas City/Chocolate Bayou - Both plant sites have received another EPA inquiry about Monsanto's use of the three disposal sites in question. Monsanto did dispose of material at the MOTCO site. It looks as if EPA is trying to build a case for future litigation. Reply to EPA will be forwarded in early June. (A rough estimate of \$40M has been thrown out as a clean up cost for the MOTCO site alone). Environmental Law is coordinating issue with the Texas Chemical Council and others who have received similar inquiries. Final strategy meeting is planned for June 9.

Texas City South 20 - Final D'Appolonia report has been received. Strategy is being developed by the plant (to be reviewed by Environmental Law and Environmental Operations) on how we should approach the state and how we should move to resolve the issue.

Avon - Plant has received directive from State of California that the site must file their state hazardous waste management operation plan (interim status) by September 30, 1981.

PCB Legislation - Texas - A bill has been introduced in the Texas House and Senate to ban the incineration and emission of polychlorinated biphenyls currently permitted at the Rollins Deer Park, Texas facility. Issue is being followed by EPA and Corporate PCB spokesman and Texas Legislative contact.

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