Jerry Bratsch
CC Don Otto
Harris Buckley
Art Leisy
Gil Hippe
Bill Engman
Ed Stewart

COMPANY CONFIDENTIAL

MEETING AT SOUTHWEST REGIONAL OFFICE OF EPA
1421 Peachtree St. N.E.
Atlanta, Georgia

November 11, 1971

F/4/E

Copies to: H. S. Bergen
J. T. Garrett
J. W. Gillespie
P. F. Heisler
P. B. Hodges
F. J. Holzapfel
G. L. Jessee
J. C. Landwehr
J. Mason
H. L. Minckler
W. B. Papageorge
P. S. Park
W. R. Robirds
J. R. Savage

Meeting with Leisy, Hodges, Hansen, Bratsch 11/12
Signed that Hansen will attempt to pin down Cayuga
Stance on PCBs - Hansen/Bratsch make trips to Chicago
to advise Chicago Office Ed EPA of [illegible] PCB
problem. - Trying to be as late than [illegible] of 11/29

PLAINTIFF'S EXHIBIT
44
4-1-98
PENGAD-Bayonne, N.J.

DSW 014379

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MEETING AT SOUTHWEST REGIONAL OFFICE OF EPA
1421 Peachtree St. N.E.
Atlanta, Georgia
November 11, 1971

Those Present:

Monsanto

J. T. Garrett
D. B. Hosmer
G. L. Jessee
J. P. Landwehr

State of Alabama

Joseph Crockett

Southwest Regional EPA

John White, Director of Enforcement
Dave Hill
Dennis Cafaro
George Earlow

Subject: PCB Effluents from Anniston Plant to Snow Creek, Choccolocco Creek, Etc.

This meeting was arranged by Mr. Joe Crockett at the request of Mr. John White.

Mr. White had two primary areas for concern:

1. The Federal Department of Justice has apparently recommended that suit be initiated against the Anniston plant for PCB emission under the Federal Refuse Act.

2. He will be required to approve or recommend a Refuse Act disposal permit for Anniston which limits pollution levels.

The PCB production history of the Anniston plant was reviewed briefly from its beginning in 1929 to the present. Our program to control and reduce PCB emissions to Snow Creek was reviewed by both Monsanto employes and Joe Crockett who emphasized that we had kept him fully advised concerning our program and our progress. Gene Jessee carefully pointed out

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that our production of PCB's had been greatly reduced in January, 1971 and discontinued in August, 1971. It was explained that current PCB emissions in the liquid effluents primarily resulted from our inability to make a complete separation of biphenyl from other polyphenyls. Mr. Jessee stated that equipment would be installed to vastly improve this separation by July 1, 1972, and that by this time a further reduction in PCB in effluents would be effected.

There was considerable discussion concerning the limiting level of PCB that should be permitted in the discharge. Mr. White suggested "no detectable amount." Mr. Crockett and the Monsanto personnel pointed out that this was an undesirable approach. The preferred concept was explained as a reduction in aqueous volume accompanied by a concentration reduction (reduced pounds per day). This appeared to be accepted.

As a result of the meeting, the following agreements were reached:

1. Mr. Crockett and Mr. White will agree upon an interim permissible level for PCB emissions to be provided in the Refuse Act permit. Obviously, Mr. Crockett will press for a number in excess of our 0.3 lbs./day current level.

2. The permissible PCB will be reviewed again when our new separation equipment is in operation as of July 1, 1972 to arrive at a new permit level.

3. A summary report outlining our past work and future plans will be written and sent to the EPA office via Mr. Crockett's office.

4. A second copy of our existing monthly reports on PCB effluents to Mr. Crockett will be forwarded to Mr. White via Mr. Crockett.

5. Monsanto is ready and willing to meet with the Federal EPA personnel concerning the PCB problems whenever requested and will feel it a privilege to describe our program.

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6. EPA can come and sample our effluents in a mutual program at any time they want to do this. (I believe they will use our data.)

We explained to Mr. John White that Mr. G. L. Jessee, the Anniston Plant Manager, was the man who spoke for Monsanto at Anniston. We further explained that Mr. Jack Garrett's presence was to indicate the support of the Company's Medical Department and that Mr. D. B. Hosmer's presence was to demonstrate support of the Monsanto Industrial Chemicals Company, who is responsible for the manufacture of PCB's.

It was suggested by Mr. White that it might be desirable to dredge Snow Creek. I believe we convinced him that this is undesirable.

We received strong indications that the Southeastern Regional EPA Office will recommend strongly against a Refuse Act suit by the Federal Department of Justice on PCB pollution.

The entire atmosphere of the meeting was favorable, including the lunch following it.

D. B. Hosmer

bt
11-12-71

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