

Monsanto

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February 24, 1977

Public Notice Clerk
Region V, Permit Branch
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

f Re: Village of Sauget NPDES Permit
Application No. IL 0021407
Joint Public Notice No. 71M-0001

Sir:

In response to certain specific requests made by Mr. Romanek at the February 14, 1977, public hearing on the reference permit, Monsanto submits the following comments which are supplemental to those filed on February 14, 1977.

1. Village of Sauget Effluent--PCB Data
Attached as Exhibit 1 are the effluent data on PCB losses from the Village of Sauget from November, 1976, through February 14, 1977. With this information the EPA has all currently available data on PCB losses.
2. Analytical Procedures--"65 Pollutants"
Monsanto stated in its February 15, 1977, written statement, page 6, item 9, that "not only has the list of 65 not been totally defined but also sampling and analytical procedures are not currently available." The information included as Exhibit 2, we believe, substantiates this statement. First, this list contains more than 65 chemical names. Of these, validated procedures exist for only 22 chemicals. A procedure is defined as validated if it appears in:

DSW 330092

- a) 1974 EPA Methods Manual,
- b) "Standard Methods," or
- c) ASTM Annual Standards.

Two additional comments are pertinent:

- 1) Of the 21, six (6) chemicals will be monitored as part of Attachment A, Condition 7.A., and six (6) are pesticides not manufactured within the Village. This leaves only nine (9) materials which could be reported on under Special Condition 10.C.6.
- 2) The cost of analyzing one sample for the 21 chemicals is projected to be \$940. Ratioing this cost to 65 chemicals would result in a cost of approximately \$3,000.00 per sample.

Again, we conclude that the capability to execute the requirements of Condition 10.C.6. does not presently exist in total. In addition, the cost to meet partial condition requirements are extremely excessive.

We appreciate the opportunity to submit these supplemental comments and are prepared to discuss all of Monsanto's comments with Agency personnel.

Sincerely,



Michael A. Pierle
Manager,
Environmental Protection

MAP:HS

cc: Ms. B. Sidler, Illinois EPA
Mr. W. Romaneck, USEPA

DSW 330093

STLCOPCB4076736

WTP = Sauget Village Waste Treatment Plant

Date	Total Plant Conc. Mg/L	PCB Concentrations and Flow in Effluent			
		Total Plant Flow - GPM	WTP Influent Conc. Mg/L	WTP Effluent Conc. Mg/L	WTP Flow MGD
11/3/76	.044	5000	.013	<.010	12.74
11/7	.042		<.010	<.010	
11/11	.068		<.010	<.010	
11/15	.039		.013	.016	
11/18	.046		<.010	<.010	
11/22	.033		<.010	.021	
11/24	--		<.010	.010	
11/26	.031		--	--	
11/29	<.010		<.010	.018	
12/2	.037		<.010	.012	
12/6	--		<.010	.019	
12/9	.126		<.010	<.010	
12/13	.115		.057	.032	
12/16	.084		<.010	.015	
12/20	.294		<.010	.016	
12/22	.203		--	--	
12/23	.031		<.010	.027	
12/27	.033		<.010	<.010	
12/30	.019		<.010	.051	
1/3/77	.045		.006	.021	
1/6	.021		<.010	.017	
1/13	.080		<.010	.015	
1/17	--		<.010	<.010	
1/20	.046		<.010	<.010	
1/24	.017		<.010	.018	
1/27	<.010		<.010	.014	
1/31	.023		<.010	.022	
2/3	.036		<.010	.011	
2/7	.052		.055	.038	
2/10	.156		.015	.053	
2/14	.113	5000	.010	.059	12.74

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STLCOPCB4076737

EPA List of 65 Toxic Chemicals

Survey of Validated Methods and Cost Estimates

<u>CHEMICAL</u>	<u>METHOD REFERENCE*</u>	<u>COST (\$)</u>	<u>DETECTION LIMIT (μg/l)</u>
1. Acenaphthene			
2. Acrolein			
3. Acrylonitrile			
4. Aldrin/Dieldrin	S.M. 509A	40	0.01
5. Antimony	EPA Storet 01097	40	200
6. Arsenic	EPA Storet 01002	60	2
7. Asbestos			
8. Benzene			
9. Benzidine			
10. Beryllium	EPA Storet 01012	40	5
11. Cadmium	EPA Storet 01027	40	2
12. Carbon Tetrachloride			
13. Chlordane (Tech)	S.M. 509A	40	0.01
14. Chlorinated Benzenes			
15. Chlorinated Ethanes			
1,2 Dichloroethane			
1,1,1-Trichloroethane			
Hexa Chloroethane			
16. Chloroalkyl Ethers			
Chloromethyl Ether			
Chloroethyl Ether			
Mixed Ethers			
17. Chlorinated Naphthalene			
18. Chlorinated Phenols			
Trichlorophenols			
Chlorinated Cresols			
19. Chloroform			
20. 2-Chlorophenol			
21. Chromium	EPA Storet 01034	40	20
22. Copper	EPA Storet 01042	40	10
23. Cyanide	EPA Storet 00720	50	20
24. DDT	S.M. 509A	40	0.02
25. Dichlorobenzenes 1,2-			
1,3 and 1,4-Dichlorobenzenes			
26. Dichlorobenzidine			
27. Dichloroethylenes			
1,1-Dichloroethylene			
1,2-Dichloroethylene			
28. 2,4-Dichlorophenol			
29. Dichloropropane			
Dichloropropene			
30. 2,4-Dimethylphenol			
31. Dinitrotoluene			

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	CHEMICAL	METHOD REFERENCE*	COST (\$)	DETECTION LIM (µg/l)
32.	Diphenylhydrazine			
33.	Endosulfan	S.M. 509A	40	0.01
34.	Endrin	S.M. 509A	40	0.01
35.	Ethylbenzene			
36.	Flouranthene (Sic)			
37.	Haloethers			
	Chlorophenylphenyl Ether			
	Bromophenyl Phenyl Ether			
	Bis (Dichloroisopropyl) Ether			
	Bis (Chloroethyl) Methane			
	Polychlorinated Diphenyl Ether			
38.	Halomethanes			
	Methylene Chloride			
	Methyl Chloride			
	Methyl Bromide			
	Bromoform			
	Dichlorobromomethane			
	Trichlorofluormethane			
39.	Heptachlor			
40.	Hexachlorobutadiene			
41.	Hexachlorocyclohexane			
42.	Hexachlorocyclopentadiene			
43.	Isophorone			
44.	Lead	EPA Storet 01051	40	50
45.	Mercury	EPA Storet 71900	40	0.2
46.	Naphthalene			
47.	Nickel	EPA Storet 01067	40	20
48.	Nitrobenzene			
49.	Nitrophenols			
	2,4-Dinitrophenol			
	Di Nitrocresol			
50.	Nitrosamines			
51.	Pentachlorophenol			
52.	Phenol			
53.	Phthalate Esters			
54.	Polychlorinated Biphenyls	ASTM D3304	60	0.1
55.	Polynuclear Aromatic Hydrocarbons			
	Benzantracenes			
	Benzopyrenes			
	Benzoflouranthene			
	Chrysenes			
	Dibenzanthracenes			
	Indenopyrenes			
56.	Selenium	EPA Storet 01147	50	2
57.	Silver	EPA Storet 01077	40	10
58.	2,3,7,8-Tetrachlorodibenzo-p-dioxin			
59.	Tetrachloroethylene			
60.	Thallium	EPA Storet 01059	40	100

	<u>CHEMICAL</u>	<u>METHOD REFERENCE*</u>	<u>COST (\$)</u>	<u>DETECTION LIMIT</u> <u>(µg/l)</u>
61.	Toluene			
62.	Toxaphene	S.M. 509A	80	1
63.	Trichloroethylene			
64.	Vinyl Chloride			
65.	Zinc	EPA Storet 01092	40	5

*S.M. = Standard Methods for the Examination of Water and Wastewater
14th Ed. (1975)

EPA = EPA Manual of Methods for Chemical Analysis of Water and
Wastes, 1974

ASTM = 1976 Annual Book of ASTM Standards

DSW 330097