Copy for Bob Bell

July 1, 1977

Ms. Kaye Jacobs
Attorney
United States Environmental
Protection Agency
Region V
230 S. Dearborn Street
Fourteenth Floor
Chicago, Illinois 60604

Re: Letter Request for Information, Dale S. Bryson to John R. Eck, June 6, 1977

Dear Ms. Jacobs:

In the above referenced letter the U. S. EPA asked for certain information concerning operations at Monsanto's William G. Krummrich Plant, located at Sauget, Illinois. This letter was subsequently discussed and clarified during our telephone conversation June 21, 1977. The information contained herein is provided to you in response to said letter and discussion.

Beginning July 1, 1977 for a period of six months we will monitor the incinerator discharge and the combined discharge, taking a 24-hour vertically integrated composite sample once a week at each location.

A substantial rehabilitation project is underway concerning the plant's sewer system. A description of this project is as follows.

> The main operation area of the plant occupies an area of approximately 100 acres. All effluent discharges from the plant operating departments and facilities are discharged into a complex network of sewer systems. This sewer system drains approximately 140 acres. A map of the plant premises and sewer system is attached.

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The plant sewer effluents are collected into small service sewers, transferred to larger laterals, and then finally discharged into three large trunk lines which are part of the Village of Sauget sewer system. Wastes from the entire Village of Sauget flow to the Village of Sauget Treatment Plant, and after treatment are discharged to the Mississippi River. Both domestic and industrial sewage are handled by this system.

The attached map divides the plant into five main areas of drainage. Areas 3 and 4 are the main operating areas of the plant. An examination of the sewer system indicated that the sewers servicing area 3 were deteriorated and in need of replacement or repair. Accordingly a major project was initiated to perform the necessary repairs or replacement of this system. No major leaks, failures or deterioration were discovered in the sewers servicing areas 1, 2, 4 and 5.

The rehabilitation project replaces the existing trunk sewer for section 3 by extending two existing sewers northward along "G" and "E" streets plus the installation of a new sewer along "D" street. The existing usable sewer lines will be tied into the new system. Sewer lines being replaced will either be excavated and removed, or filled with grout and abandoned in place.

The old sewers which are being replaced are shown in light blue on the attached drawing, with the new sewers shown in red.

New sewer piping will be one of these three types:

a. Ductile iron soil pipe, schedule 40

b. Reinforced concrete culvert

c. Vitrified clay pipe with a reinforced concrete encasement. All joints will be sealed with furan resin and poured sulfur.

New manholes will be acid proof brick lined, with an average box depth of 11 feet below grade.

The project will include installation of approximately 2,475 feet of vitrified clay pipe, sizes 6" diameter through 36" diameter; 230 feet of ductile iron sewer

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pipe, 4" through 12" diameter; and 600 feet of reinforced concrete culvert. Additionally, repairs will be made to other existing sewer lines as necessary to upgrade the entire system to "like new" condition. Nineteen new manholes will be constructed, and several existing manholes will be repaired. Total cost of the project is estimated to be $2,450,000. Work commenced in January, 1977, and is expected to be completed by December, 1977.

This project does not directly affect the sewer system servicing the Monsanto PCB production facility, located in Area 4 on the attached map. Effluent from this facility flows south on the map across Area 4, and then west in a 24" trunk line leaving the plant and flowing into the Village of Sauget sewer system. As far as we are aware, these sewers have no major leaks or failure points and are adequate for present and future use. The sewers within the PCB manufacturing area will be disconnected and sealed off as part of the PCB shutdown program.

The above referenced letter requested information concerning the total amount of PCBs currently being stored on site, plans for distribution of any PCBs not distributed by October 31, 1977, and disposition of PCB contaminated equipment. As I pointed out to you during our discussion, the EPA Office of Toxic Substances will be promulgating regulations in the near future on the handling and disposal of PCBs. We will, of course, comply with those regulations.

At this time the amount of waste PCB awaiting incineration at the plant varies from around 1,000,000 to 1,500,000 pounds. It is contained in storage tanks at the incineration location. The amount of PCB product inventory on hand averages around 1,500,000 pounds. It is contained in storage tanks in the production department and in tank cars. Some drum inventory of product is maintained in protected indoor warehouses. We plan to incinerate any PCBs which have not been distributed on or before October 31, 1977.

As mentioned during our discussion, we plan to deal in an orderly manner with equipment which has been used in the production and handling of PCB. Such equipment which can be adequately cleaned will be reused internally for industrial type chemicals. Nonreusable equipment, including all remaining

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processing equipment and piping, will be drained thoroughly to remove PCBs. Liquids will be incinerated. All equipment will be sealed and buried in an approved landfill.

After all equipment has been removed, the production site will be cleared to approximately one foot below grade level. Sewers will be disconnected and sealed off. All contaminated rubble will be removed to an approved landfill for proper disposal.

All washings used in the decontamination will be treated to remove PCB and/or will be incinerated.

In summary, we plan to proceed in an orderly and environmentally sound manner in closing down our PCB operations. We hope that the information provided above satisfactorily responds to your questions. Please direct any further inquiries on this subject to me at the above address.

Yours very truly,

Phocion S. Park
Environmental Counsel

jf

Enclosure

bcc: R. E. Bilger
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