E. N. Brasfield - St. Louis - E3NG

3/1/74

JR Eck - E2SF
SL Hunter

TOXIC POLLUTANT EFFLUENT STANDARDS

J. V. Waggoner

Per Mr. Eck's request I called Howard Mehns of AmCy yesterday to discuss pending EPA standards on toxic pollutant effluent standards. Mr. Mehns had called Dr. Fernandez about Monsanto's extremely low [illegible] in EPA hearings on this subject in January. AmCy had lodged a formal objection in a hearing along with several other companies. Paul Hodges of MECC presented a statement on PCB's, mercury and cadmium. Neither Sohio, Du Pont nor Monsanto made presentations about AN effluent standards.

Mr. Mehns sketched the history beginning in December 1973 when the EPA planned in the Federal Register preliminary standards and called for public hearings in January 1974. The type of product included cyanides, mercury, cadmium, pesticides and many other materials. Preliminial hearings occurred on January 25, 1974 to set ground rules for subsequent hearings. Future meetings will occur between April 8 and May 15. Companies wishing to make formal presentations must submit written testimony to the EPA by March 15, 1974. The target date for issuance of final regulations is June 25, 1974. Mr. Mehns has talked also with Du Pont and Sohio. He believes the cyanide effluent should be discussed among the major AN producers with some common ground established on permissible levels of cyanide in effluent streams.

The EPA is seeking the right to shutdown plants not in compliance with the proposed regulations. Since some of AmCy's waste streams goes directly to a river, they particularly are alarmed and believe that the EPA posture to be unrealistic. He specifically is proposing that each major AN producer nominate one man knowledgeable in AN manufacture and waste treatment to meet and discuss the industrial problem in reference to permissible level of cyanide. (I believe we are in a good position vs. our three competitors in this area since our cyanide concentration in the Chocolate Bayou effluent stream is practically non-existent due to the use of deep-well, but this potential problem with EPA standards could become very real for us in the future if and when we move to surface treatment.)

PCB-ARCH0750231

I told Dr. Nehms that we would discuss his suggestion in-house and respond as soon as possible. Contacts in various companies which he gave me are as follows:

Jerry Forlenza, President, Indus. Chem. & Plastics, AmCy
Frank Meiner, V.P. " " " "
W. G. Paxton, Dept. Manager, Chemical Products, AmCy
C. L. Pulsfort who reports to Mr. Paxton, AmCy
V. E. Stilfoll, Plant Manager, Forshay, La.
John Locker, Sohio
John Metzger, Du Pont - 302-774-3658
X John Georges, Coordinator for Environmental Matters, Du Pont 302-774-8214

AmCy has retained the law firm of Covington & Burlington in Washington, D.C. to represent them in environmental matters with EPA.

Sexton and I have asked Manufacturing and PT Depts. to respond shortly on our status with effluent performance and also to assess potential problems with cyanide in the effluent streams in the future if we move toward surface treatment. [redacted]

Earl N. Brasfield

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PCB-ARCH0750232