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Marjorie Brooks

August 21, 1991

Memorandum

TO: Loren W. Wassell
Kevin S. Cahill
Andrea H. Smith

FROM: Marjorie Brooks

Attached for your review is the first draft of a contingency media statement and questions and answers for the Dead Creek testing project.

The information is based on the E & E report on the Sauget sites and from Max McCombs. In a few cases, answers were unavailable and will need to be developed.

Please advise with your comments and suggestions.

xCc: Larry O'Neill
Steve Krohmer
Max McCombs
Warren Smith

attachment

cc: Robert L. Peirce

Please provide comments to me (4-7002) or Kevin Cahill (4-7518).

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To Loren Wassell	From Marjorie Brooks
Co. Monsanto	Co. Fleishman-Hillard
Dept.	Phone # 982-8624
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DSW 136698

First Draft

Contingency Statement

Dead Creek Sector B Testing

Monsanto Company is collecting samples from a portion of Dead Creek and two adjacent sites to determine the types of chemicals present. The chemicals came from a number of industrial and commercial sources over the last 75 years.

The part of the creek being tested runs from Queeny Avenue to Judith Lane in Sauget and Cahokia and is fully enclosed by a chain-link fence.

The other sites are known as Sites L and M. Site L, east of the creek and south of Queeny Avenue, is a former surface impoundment used by a hazardous waste hauler to dispose of wash water from truck cleaning. Site M, immediately east of the creek and approximately 300 feet north of Judith Lane, is a former sand pit excavated in the 1940s.

The sampling is being done as part of a long-range, voluntary program by Monsanto to evaluate the need for corrective action in the area. Because of the proximity of sites L and M to the creek, the company believes that options for corrective action cannot be fully evaluated without more thorough knowledge of those sites.

First Draft

Questions and Answers
Dead Creek Sector B

1. Q. Why is Monsanto doing this testing?

   A. To determine the types of contamination present and to began evaluating options for corrective action.

2. Q. Since Monsanto knew of the contamination years ago, why didn't the company do the testing sooner?

   A.

3. Q. How much will the testing cost?

   A. About $300,000.

4. Q. Where is Sector B of Dead Creek?

   A. It runs from Queeny Avenue to Judith Lane, in Sauget and Cahokia.

5. Q. How long is that?

   A. Sector B is approximately _____ in length.

6. Q. How much water is in the creek?

   A. Water levels in the creek vary substantially, depending on rainfall, and during extended periods of low precipitation, the creek can become a dry ditch.

7. Q. What chemicals are in the creek?

   A. The sediment contains a variety of organic chemicals and metals.

8. Q. Has dioxin been found in the creek?

   A. No.

9. Q. Have PCBs been found in the creek?

   A. PCBs have been found in some previous samples of sediment taken from Sector B.

10. Q. Where did these chemicals come from?

A. The chemicals came from a number of industrial and commercial sources over a period of 75 years.

11. Q. What health hazards are posed by these chemicals?

A. Some of the chemicals are considered hazardous if they are not contained properly. The chemicals in the creek are contained because the culverts have been blocked off at Judith Lane and Queeny Avenue, creating a surface impoundment that holds the water in place. The creek segment is also fully enclosed by a chain-link fence. No drinking water is drawn from the creek. There is little likelihood of public contact and thus, there is believed to be no health risk.

12. Q. What property is adjacent to Sector B of the creek?

A. There are about a dozen industrial, commercial and residential properties adjacent to Sector B.

13. Q. Is Sector B accessible to the public?

A. No. The creek is encompassed by a chain-link fence installed in 1982.

14. Q. Has the health of nearby residents been affected by the chemicals in the creek?

A. No, because there has been little likelihood of public contact with the chemicals in the creek.

15. Q. One resident has claimed that his dog went in the creek and then died of chemical burns. What does Monsanto say about that?

A.

16. Q. How did Monsanto's chemicals end up in Sector B?

A. Prior to the 1930s, when the state of environmental knowledge was not as advanced as it it today, Dead Creek was used to discharge waste from a number of industrial and commercial operations in the area, including the Krummrich plant. Monsanto stopped that practice many decades ago.

17. Q. Does Monsanto still discharge waste into the creek?

A. Monsanto has not discharged waste into the creek for many decades. Monsanto has a philosophy that the best way to deal with hazardous waste is to avoid making it in the first place. At the Krummrich plant, great emphasis is placed on waste-minimization efforts. The plant reuses and recycles materials wherever possible. The next preferable option is to destroy or treat the waste, with land disposal the last option.

Wastewater from the Krummrich plant is treated three times before it is discharged into the Mississippi River. First, it goes through a $25 million pre-treatment system at the plant, in which 11 organic chemicals are removed and levels of six others are reduced. It then goes to the Sauget Physical-Chemical Primary Treatment Plant, where acids are neutralized and solids and heavy metals are removed. The wastewater then flows to the American Bottoms Regional Wastewater Treatment Plant, where organic chemicals are removed.

18. Q. Have all the adjacent property owners given permission for the testing?

A. No, several property owners have not.

19. Q. How will the lack of access affect testing?

A. Monsanto still hopes to negotiate access for the testing from all the adjacent property owners. However, if access is not granted, Monsanto will be able to work around the properties.

20. Q. How long will the testing take?

A. The testing is expected to take several months.

21. Q. Who will do the testing?

A. Geraghty and Miller, an environmental engineering firm, will do the testing.

22. Q. Will the workers wear protective clothing?

A. Yes, the workers will be fully protected.

23. Q. Will the IEPA oversee the testing?

    A. We have provided the agency with a sampling plan and they are invited to oversee the work if they feel that it is necessary.

24. Q. Will the test results be made public? How and when?

    A. We will work with the IEPA to assure the public availability of the test results.

25. Q. How is it possible to confine testing and/or corrective action to only part of a creek? Wouldn't the flow of water spread the contamination?

    A. Because the culverts have been blocked off at at Queeny Avenue and Judith Lane, Sector B is like a surface impoundment, holding water in place. In addition, the IEPA has done sampling downstream and found minimal residual contamination.

26. Q. Where are sites L and M?

    A. Site L is a former surface impoundment used by a hazardous and special waste hauler to dispose of wash water from truck cleaning. The former impoundment is approximately 250 feet south of the present Metro Construction Equipment Company building and about 125 feet east of Dead Creek in Cahokia.

    Site M, in Cahokia, is a former sand pit excavated by H.H. Hall Construction Company in the mid- to late 1940s. It is immediately east of Dead Creek and approximately 300 feet north of Judith Lane.

27. Q. Why is Monsanto also testing sites L and M?

    A. Monsanto is testing sites L and M because they are adjacent to Sector B of Dead Creek. Because of their close proximity to the creek, we believe that options for corrective action cannot be fully evaluated without more thorough knowledge of those sites.

28. Q. Who owns sites L?

    A. Site L is owned by Metro Construction Equipment Company. The site is covered with cinders and is used for equipment storage.

29. Q. How big is site L?

A. The dimensions of the former surface impoundment were approximately 70 feet by 150 feet. The site is now covered with cinders and is used by Metro Construction Equipment Company for equipment storage.

30. Q. Is site L accessible to the public?

A. Access to the area is not controlled.

31. Q. What chemicals have been found at sites L?

A. Previous water samples taken from a nearby monitoring well have indicated the presence of such organic chemicals as chlorophenol, phenol and cyclohexanone, as well as heavy metals. Previous surface soil samples were found to contain alkyl benzenes, dichlorobenzene, dichlorophenol, hydrocarbons, napthalenes, trichlorobenzene and PCBs.

32. Q. How did site L become contaminated?

A. Site L is a former surface impoundment used by a hazardous and special waste hauler to dispose of wash water from truck-cleaning operations.

33. Q. Who owns site M?

A. Site M is a sand pit excavated by the H.H. Hall Construction Co. in the mid- to late 1940s. WHO OWNS THE PROPERTY NOW?

34. Q. Is site M accessible to the public?

A. No. Site M is enclosed by a chain-link fence that also encompasses Sector B of Dead Creek.

35. Q. How big is site M?

A. Site M is approximately 275 by 350 feet, and the estimated depth is 40 feet.

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36. Q. What chemicals have been found at site M?

A. Previous water samples showed no significant contamination, although water-quality standards for copper, phosphorous and zinc were exceeded. Trace levels of PCBs were also been found in previous water samples. Previous sediment samples indicated the presence of several chemicals, including cadmium, chromium, copper, lead, nickel, zinc and PCBs.

37. Q. How did site M become contaminated?

A. The IEPA has no information concerning waste-disposal activities at site M. It is possible that disposal occurred, however, since access to the pit was unrestricted until a snow fence was erected in 1980. (The snow fence was replaced by a chain-link fence in 1982).

38. Q. Why is this testing needed if the Illinois EPA tested all the Sauget sites in 1988?

A. The IEPA testing was not extensive enough to define options for corrective action.

39. Q. What will Monsanto do after the test results are known? Will the company clean up Sector B?

A. Monsanto will use the information gained from the sampling to evaluate options for corrective action.

40. Q. Will Monsanto pledge to clean up Sector B voluntarily since Cerro Copper cleaned up Sector A voluntarily?

A. We can't make that kind of commitment without the information these tests are designed to provide.

41. Q. If Monsanto won't voluntarily clean up Sector B, can the Illinois EPA file suit to force Monsanto to do so?

A.

42. A. Will Monsanto clean up sites L and M?

A.

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43. Q. Why has it taken so long to get the creek cleaned up? What about former Gov. James Thompson's assurance in 1984 that Dead Creek would be cleaned up within a year?

A. Access to the site is limited, so exposure is limited. The chemicals in the creek need to be addressed, but do not present an immediate hazard.