

Monsanto

FROM : W. B. Papageorge (4-8125) G4WA
INT - LOCATION - PHONE :

DATE : July 6, 1981

SUBJECT : Monthly Report
June 1981

REFERENCE :

TO : M. Dmytryszyn - G4WA

cc: C. P. Farley - G4WA
M. R. Foresman - G4WA
H. M. Keating - G4WA
P. A. Klingsporn - G4WA
C. J. Larsen - 5040
M. C. Throdahl - D1D
M. F. Weishaar - G4WA

HIGHLIGHTS

Area Incinerator Pre-Project Board

P. Klingsporn will assume chairmanship of the Pre-Project Board replacing W. Smull. R. Wiese will replace D. Weber as the CED representative. R. London will become the manufacturing representative on the board. The project will proceed with waste heat recovery included. An October Board for AR approval is now planned. The evaluation for incineration at sea and elimination of waste heat boiler and ESP must be completed prior to CAC review to achieve an October Board.

NIOSH Dioxin Study

NIOSH (P. A. Honchar, Ph.D.) submitted a request in March to Dr. Gaffey for access to personnel and medical records of W. G. Krummrich, J. F. Queeny and Nitro workers who may have been exposed to dioxin isomer contaminated materials, such as: 2,4,5-T acids and esters; 2,4,5 tri-chlorophenol; or pentachlorophenol. Honchar visited the general offices May 4 for a discussion of how to meet NIOSH's needs while avoiding unnecessary interferences at the plants. While legal safeguards and an appropriate study protocol were being resolved, NIOSH issued subpoenas to all 3 locations. A meeting with NIOSH lawyers and Honchar to resolve differences is scheduled.

Texas City and Chocolate Bayou Plants - NPDES Permits

Permit renewal applications for both plant sites were completed and forwarded to Region VI EPA prior to the June 30, 1981 renewal deadline.

Texas City Plant Spare Disposal Well

Region VI EPA has confirmed the "interim status" claimed by Monsanto for the new spare disposal well in the November 1980 RCRA (Resource Conservation and Recovery Act) Part "A" Permit Application. The confirmation by EPA enables us to avoid a long drawn out permitting application procedure and to proceed with the drilling of the spare well. Drilling is scheduled to begin in September 1981.

CONFIDENTIAL

C07323

July 6, 1981

OSHA - W. G. Krummrich Plant Inspection

The industrial hygiene portion of an inspection conducted during the first quarter 1981 resulted in a serious citation based on monitoring results in excess of the mercury standard for 2 of 6 workers sampled. An informal conference with OSHA was held early June, following which OSHA withdrew that citation.

SUMMARIES1. Objective

Increase product quality and reduce costs through MCI Quality Assurance Program.

IBM has expressed interest in writing a computer program for the management of an analytical laboratory. The program would follow samples from log-in to reporting of results and store results for future trend analysis studies. If MCI is selected as the pilot company for development of the program, it will speed up our switch to computer management and also contribute to establishing Good Laboratory Practice (GLP) programs in product quality assurance.

2. Objective

Contest unreasonable 1980 and 1981 OSHA citations at the W. G. Krummrich plant.

Status

OSHA - W. G. Krummrich Plant Inspection - The industrial hygiene portion of an inspection conducted during the first quarter 1981 resulted in a serious citation based on monitoring results in excess of the mercury standard for 2 of 6 workers sampled. An informal conference with OSHA was held early June, following which OSHA withdrew that citation.

3. Objective

Obtain the appropriate resources for timely study of causes of death of former Texas City plant employees. Conduct a total plant mortality study.

Status

The vital status of more than 95% of 5505 current and former employees has been determined. The additional data (such as hire date, date of birth, termination date, etc.) which is now being computerized is readily available for wage employees but complications relative to inclusion/exclusion of salaried personnel will be resolved early July. Following this resolution, a realistic completion date for the study can be projected.

CONFIDENTIAL

C07324

July 6, 1981

4. Objective

Coordinate with other producers to provide appropriate testing of mono and dichlorobenzenes and obtain reasonable regulations for testing chlorobenzenes as EPA implements Section 4 of TSCA.

Status

CMA Chlorobenzene Panel of 5 participants is sponsoring teratology testing of mono and di (ortho and para) chlorobenzenes with Dow as the contractor. The mono teratology study interim report showed no compound related effects in rats, but a lack of comparable assurance in rabbits. The repeat rabbit study completed in June showed no compound related effects. Pilot testing of ODCB was completed and the teratology study is underway. Although plans for the pilot study of PDCB continue this study may not be necessary since results of a European study have been received and will be reviewed with EPA.

The SOCMA Chlorobenzene Producers Association (CPA) had a third meeting with EPA TSCA Section 4 personnel June 24 to discuss voluntary versus mandatory testing. It is anticipated that EPA will drop testing requirements for the tetra and penta compounds and their chlorobenzenes category approach. CPA committed to a reproductive study of mono. EPA agreed to review new subchronic data on ODCB and PDCB obtained from NCI and PDCB data obtained via ICI, with the good possibility of finding the subchronic data on these compounds as suitable as that available for mono. The question of whether EPA will insist on oncogenicity testing of 1-2-4 tri-chlorobenzene is under review by EPA. A future meeting is probable mid-July.

5. Objective

To determine if employees exposed to chlorophenols exhibit any signs of adverse health or dermal effects in comparison to those not so exposed.

Status

A team under the direction of Dr. Suskind made a thorough study, starting October 1979, to identify any chloracne or other biological indicators among penta and chlorophenol exposed workers at the W. G. Krummrich plant. A preliminary report of the study, 9/80, confirmed chloracne from penta exposure but was not definitive for exposure to the lower chlorophenols. Efforts of DMEH to extract a final report from Dr. Suskind continue.

NIOSH Dioxin Study - NIOSH (P. A. Honchar, Ph.D.) submitted a request in March to Dr. Gaffey for access to personnel and medical records of W. G. Krummrich, J. F. Queeny and Nitro workers who may have been exposed to dioxin isomer contaminated materials, such as: 2,4,5-T acids and esters; 2,4,5 tri-chlorophenol; or pentachlorophenol. Honchar visited the general offices May 4 for a discussion of how to meet NIOSH's needs while avoiding unnecessary interferences at the plants. While legal safeguards and an appropriate study protocol were being resolved, NIOSH issued subpoenas to all 3 locations. A meeting with NIOSH lawyers and Honchar to resolve differences is scheduled.

CONFIDENTIAL

C07325

July 6, 1981

6. Objective

Coordinate and provide input to MCI programs to ensure compliance with corporate and regulatory OSHA/EPA guideline and regulations.

Status

Pensacola Butane/Maleic Project - A memo to Region IV EPA detailing Monsanto's understanding of certain permit language was sent June 12, 1981. No comments from Region IV to date. A revised waste summary for the new Maleic facility was received. The total liquid waste to deepwell is now 16.2 gpm.

RCRA Chlor-Alkali Brine Mud Delisting - A draft of a stipulation between the Chlorine Institute and the EPA was completed and reviewed for discussion with the Federal EPA.

CMA PCB Survey - Developed data base for completion of Chemical Manufacturers Association PCB survey for totally enclosed and related uses of PCB and PCB contaminated fluids in equipment. Started review for data base for CMA's response to the Court of Appeals on the incidental manufacturing of PCB's at concentrations below 50 ppm. Major source of incidental PCB generation and distribution is the MCB process and downstream products.

Area Incinerator Pre-Project Board - P. Klingsporn will assume chairmanship of the Pre-Project Board replacing W. Smull. R. Wiese will replace D. Weber as the CED representative. R. London will become the manufacturing representative on the Board. The project will proceed with waste heat recovery included. An October Board for AR approval is now planned. The evaluation for incineration at sea and elimination of waste heat boiler and ESP must be completed prior to CAC review to achieve an October Board.

Columbia NPDES Permit - A meeting has been set with the State of Tennessee Division of Water Quality Control to review the draft permit on July 22, 1981. Final draft of proposed changes will be forwarded to the state by July 15, 1981.

7. Objective

Influence and manage programs within MCI to ensure compliance with regulatory and corporate environmental guidelines.

Status

Avon Plant - NPDES Permit - The California Regional Water Quality Board, San Francisco Bay Region, has determined that Monsanto's Avon plant be named as a co-permittee along with TOSCO on the refinery's NPDES permit. This request is at the discretion of the Regional Board, and within the provisions of existing laws. Monsanto Environmental Law Group has discussed this issue with the Board's attorneys. The Board has agreed to forward a properly signed request for application which also delineates what parts of the application should be completed.

CONFIDENTIAL

C07326

7. (Continued)

After submission of the application we have the opportunity to argue to the Board that Monsanto should not be a named co-permittee. The Board has the authority, when in the public interest, to not name Monsanto a co-permittee.

Environmental Operations and Environmental Law are assisting the plant with the procedural aspects of the issues and providing advise in preparing for the presentation of the data to the Board.

Texas City and Chocolate Bayou Plants - NPDES Permits - Permit renewal applications for both plant sites were completed and forwarded to Region VI EPA prior to the June 30, 1981 renewal deadline.

Superfund Notifications - All Sites - Notification of past hazardous waste management activities relative to closed landfill sites as required by the Comprehensive Environmental Response, Compensation and Liability Act (Superfund) was completed by all plant sites by the June 9, 1981 deadline.

MSD Pretreatment Program - J. F. Queeny Plant - It appears that MSD (St. Louis Metropolitan Sewer District) will miss the July 1, 1981 deadline for submission of the District's Pretreatment Program Plan to EPA. MSD is not concerned over this program slippage. This in turn delays the effective date of the proposed new pretreatment ordinance (estimated to go into effect in 1982) by at least another 6 months.

Texas City Plant Spare Disposal Well - Region VI EPA has confirmed the "interim status" claimed by Monsanto for the new spare disposal well in the November 1980 RCRA (Resource Conservation and Recovery Act) Part "A" Permit Application. The confirmation by EPA enables us to avoid a long drawn out permitting application procedure and to proceed with the drilling of the spare well. Drilling is scheduled to begin in September 1981.

W. B. Papageorge

ja

CONFIDENTIAL

C07327