Monsanto

CONFIDENTIAL

FROM (NAME & LOCATION) E. E. Stewart, W. G. Krummrich Plant

DATE : October 26, 1972

cc: A. E. Leisy
W. B. Papageorge - B2NA

SUBJECT : POLYCHLORINATED BIPHENYLS
WGK STRATEGY

REFERENCE : MINUTES OF MEETING - 10/20/72

TO :
G. L. Bratsch
W. C. Engman
P. E. Heisler
G. A. Hippe
P. B. Hodges - E1SF
J. R. Savage - B2SL
E. E. Stewart

The above met to review the status of the WGK strategy for dealing with the federal and state authorities with regard to "Polychlorinated Biphenyls and the Environment." Information presented for discussion and future actions to be taken are summarized below.

I. An "in-hand" status report was presented for the Federal authorities on what we have done are doing and will do at WGK to control PCB's from the environment.

DISPOSITION: Where necessary, sections will be altered to reflect that we have and can meet the expected EPA guideline. In the original version we stated we expected to be tenfold better than guideline. (The assumption has been made that guideline will be based on concentration in the receiving water, i.e. Mississippi River).

After corrections, all will receive document for review.

II. Graphs were presented showing current knowing losses to be about 0.001 ppb as a calculated concentration in the Mississippi River. Based on measured losses from the Aroclor and incinerator areas of about 1 #/day. Losses at the Waste Treatment Plant Effluent of about 5 #/day are equivalent to a calculated concentration about 0.005 ppb in the Mississippi River.

III. Fish data were presented.

DISPOSITION: River water samples will be obtained upstream and downstream. Will sample above and below plant outfall and upstream on the Mississippi, Missouri and Illinois Rivers. Expect to be abl, to measure down to 0.05 ppb concentration.

DSW 310758

IV. A brief comparative review between WGK and governmental methodology was made. Hap Horner visited government laboratory at Cincinnati on 10/19/72. They start with larger sample and evaporate to smaller amount, use different organic solvent and employ different initial sample clean-up procedure.

DISPOSITION: Hap will issue a report and differences will be resolved.

V. WGK - EPA CONTACT

Initial contact will not be made until we know for certain that limits will be established on PCB. Strategy is then to have limits established that we can attain.

A. 180 Day Notice - Outside chance that PCB may be mentioned at 12/6/72 hearing. Will attempt to find out at prehearing conference. Specific strategy to be developed after prehearing conference. Consider giving modified "in-hand" document mentioned in (I) above.

B. Water Quality Bill - Chance that PCB's may be considered a toxic material with regard to water quality. Timing could follow this sequence following enactment on 10/18/72.

1)	EPA to publish list of pollutants that are toxic.	3 months
2)	EPA to publish proposed effluent limitations	6 mos after 1
3)	EPA to promulgate standards (include 30 day hearing)	6 mos after 2
4)	Standards to become effective	12 mos after 3

C. I recommend that we make contact with the Federal EPA in Washington accompanied by Region V EPA <u>after PCB's are declared toxic</u> and <u>before standards are promulgated</u>.

We should review our data as related to the "Polychlorinated Biphenyls and the Environment -- Interdepartmental Task Force on PCB's" report of May 1972.

We should show two year trend data.

DSW 310759

V. WGK - EPA Contact (Continued)

We should push for limitations

1) Based on receiving water (Mississippi River)

2) Based on 246 and Incinerator area

3) Based on "knowing losses" of 1-2 #/day average

4) Based on acknowledgement and consideration of 5 #/day average background

5) State limits to be same as federal limits with same timing.

Must keep state informed of conversation at Federal level.

VI. ADDITIONS

A. We should implement the existing WGK control program to get "knowing losses" down to essentially zero.

B. Resolve any discrepancies in methodology between WGK and Government PCB laboratory analyses.

C. If PCB is on toxic list we develop a fish-water coordination study.

D. Review possible Aroclor customers in Illinois to be sure our actions within the state are evaluated in terms of potential customer problems.

Edward E. Stewart
Technical Services Department

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