Monsanto

COMPANY CONFIDENTIAL

FROM (NAME & LOCATION) E. E. Stewart, Krummrich

DATE : June 16, 1972

cc: G. L. Bratsch
J. R. Savage - B2SL

SUBJECT : MINUTES OF MEETING - 6/15/72
WGK STRATEGY - EPA POLICY ON PCB's

REFERENCE

TO :
W. C. Engman
P. E. Heisler
G. A. Hippe
P. B. Hodges - E1SF
A. E. Leisy
W. B. Papageorge - B2NA
E. E. Stewart

The above met to review the strategy for dealing with the federal authorities in the near future with regard to "Polychlorinated Biphenyls and the Environment". The WGK strategy can be summarized as follows:

OBJECTIVE:

Continue Aroclor production at WGK indefinitely in such a manner to restrict knowing discharges from the manufacturing department and the incinerator area to the lowest technical achievable level.

Information to be given will include:

I. Chronological history of actions taken at the W. G. Krummrich Plant to reduce PCB entrances into the environment.

II. Current program being implemented to restrict knowing discharges to the lowest technical achievable level.

III. Data from the continuous monitoring of the manufacturing and incinerator effluent streams. The results will be expressed in terms of PCB concentration in the river.

(Written documents that will be submitted to the federal authorities will have legal approval.)

(The method for sampling the manufacturing and incinerator effluent streams will be done by best method available to get most accurate results. Specifics related to sampling procedures will be avoided.)

DSW 310828

OBJECTIVE (cont'd)

(Although it is desirable to express PCB losses in terms of concentration in the river we must be prepared to answer in terms of pounds of PCB's per day. We will not differentiate between monochlorobiphenyl and the higher (poly) chlorobiphenyls.)

RELATED ACTIONS:

I. Determine present concentration of PCB in fish. Low key resolution of differences between Monsanto and Government method of analysis.

(Arrangements made to get several of 3 species of fish. WGK lab to analyze. Will get near Kimmswick which is about 15 miles south of plant where adequate mixing in the river will have occurred. Lab results for PCB content will be determined before getting additional fish from other locations.)

II. No contact with federal authorities be made until we have fish PCB concentration data.

(Must decide whether to take initiative and contact federal authorities where we can select the time, place and people with whom we talk or wait until they contact us on their terms. Consideration should be given to making our initial formal contact with Mr. Mayo, Acting Director of Region 5, EPA. Scuttlebut says Mr. Adamkus, Deputy Regional Administrator will replace Mayo after the election. If the latter choice is made we must have all our information "in hand" and be prepared for short notice of their desire to talk with us.

It is important that we educate those with whom we contact just what PCB's are and what they are not.)

III. No discussion of plant raw materials, finished goods or process information be made with federal authorities.

IV. Keep historical data on Waste Treatment Plant Influent and Effluent in terms of calculated concentrations in the river using data from the existing drum samplers. Obtain random samples from fish to compare.

(Again, although it is desirable to express PCB losses in terms of concentration in the river, we must be prepared to answer in terms of pounds of PCB's per day.)

DSW 310829

RELATED ACTIONS (cont'd)

V. Contact or liaison between plant and federal authorities will be P. Heisler. Specific information related to program and data will be transmitted by Ed Stewart.

(Initial contact may be made by others.)

Edward E. Stewart
Technical Services Department

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