

FROM : J. R. Condray - General Offices - B28C (4-5254)

DATE : July 30, 1979

SUBJECT : Nitro Hazardous Wastes -
Eckhardt Questionnaire

BY : H. M. Callaway
W. J. Hilsenrath
R. S. Nelson
R. M. Scott

TO : C. F. Callis
B28A

The Nitro Plant supplied Congressman Eckhardt's sub-committee on hazardous waste with three basic types of information:

1. General information about the Nitro Plant and its wastes disposal practices
2. Information about disposal sites used by the Nitro Plant from 1950 to date
3. Information about waste haulers used by the Nitro Plant from 1950 to date

Much of the information is based on best guess estimates. The reason for using estimates is tied to the fact that plant records beyond 1966 were destroyed in compliance with Monsanto record retention policy and corporate insistence that "don't know" is not a satisfactory response. The plant feels fairly confident that all disposal sites (8) used since 1950 have been identified (7 off-site, plus the plant on-site facilities, which was identified as a single facility). The exact periods of time the sites were used is not well established for each. The major area of uncertainty is the quantity and composition of the waste disposed of before 1966.

The Eckhardt questionnaire dealing with disposal sites required an identification of present, not present, or don't know for each of 58 components (generic) or characteristics listed on the form. The Nitro Plant completed a disposal site questionnaire for each of the 8 sites used. The rationale used for identifying the composition of the Nitro materials disposed of at the site and included in the group of 58 was:

Present - Records indicate the presence of the material in our waste or first-hand knowledge indicates the material was a product, raw material, or impurity known to be used at the plant and could have been disposed of at one of the sites.

EX 72

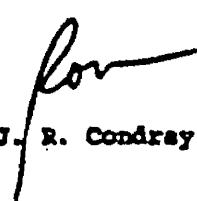
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Not Present - No first-hand knowledge that the material was ever used at the plant.

Don't Know - Material known to be used at plant, but low probability of waste disposal or don't know if used at plant.

The information supplied to the Eckhardt committee has been extracted from the questionnaire and reorganized in a more readable form (copies enclosed). Where we have indicated a generic material is present in the waste (herbicides, amines, etc.), an identification as to the specific chemical involved has been developed for Monsanto internal use. The specific identities of the wastes will help in developing responses to potential inquiries that may develop as a result of the Eckhardt study.


J. R. Condrey

JRC:csv
Enclosure

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