REDRAFT 11/7/86

DRAFT: LETTER TO NJ DEP REGARDING: KEARNY PLANT SUBSURFACE INVESTIGATION AND ACTION PLANS

Monsanto is reporting the results of a subsurface investigation in and near the production area at our Kearny, New Jersey plant. The investigation was completed by O.H. Materials of Findlay, Ohio, on November 10, 1986. There is no public health or environmental danger associated with the site, however, results from the investigation indicate two points should be reviewed:

A. EVIDENCE OF ORGANIC MATERIAL FLOATING ON THE GROUNDWATER.

STATUS: There is a layer of organic material similar to our product and raw materials floating on the groundwater. Organic materials have accumulated on top of the groundwater during 30 years of operation. ~~under accepted conditions.~~ The layer is centered around the production area, with traces extending several hundred feet to the south. Testing verifies that the material has not migrated off the plant site. Testing also indicates only very low levels of dissolved organic material in the groundwater. Our action plan, described below, addresses both the floating organic layer and the groundwater.

ACTION PLAN:

1. PREVENTION: In 1982, the plant initiated a voluntary program of tank dike upgrading on a priority basis. We have already made operational changes and have upgraded many of our secondary spill containment systems. To avoid or minimize the impact of potential product leaks, additional spill containment, curbs, and paving will be installed.

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2. CONTAINMENT: We will construct a subsurface baffle along the southern boundary of the site to prevent possible migration off the plant site.

3. REMOVAL: The recoverable organic layer will be pumped to a containment area, separated from the groundwater, and disposed of via incineration. The resulting water will be used in plant processes or discharged to the POTW in accordance with applicable regulations.

4. MONITORING: We will continue to periodically monitor the groundwater to detect any changes.

B. EVIDENCE OF PCB PRESENCE IN THE SOIL.

STATUS: In the 1960's, PCB's from a process heat transfer system in the Alkylphenol unit were landfilled near the process area. Monsanto in 1979 excavated this area (approximately 85 cubic yards) and sent the contaminated soil to an off-site hazardous waste landfill. The manifest sent to the New Jersey DEP cited the presence of PCB's in the material sent to the off-site hazardous waste landfill. In 1983, preliminary studies were conducted to assess the presence of any PCB's remaining after the 1979 cleanup. In 1984, O.H. Materials was hired to conduct a thorough investigation to establish subsurface conditions and the extent of PCB's present and to help with defining an effective remedial action plan.

OHM's Final Report Indicates:

1. There are still measurable quantities of PCB's bound to the soil, and the PCB's are confined to the site.

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2. The PCB's are present in a 1/2 acre area with depths ranging from two to 16 feet maximum (confining peat layer at 16 feet). The majority of the contaminated soil extends less than 6 - 8 feet below the surface.

3. There is no exposure problem. The PCB's are bound to the soil; all of the area is either under the Alkylphenol unit control building, pavement, or a gravel layer.

4. In 1984, tests showed very low levels of PCB's in the observation wells. O. H. Materials reports that this was due to the trauma caused by the installation of the wells, resulting in the soil being temporarily suspended in the groundwater. Subsequent tests in 1986 ~~seem~~ to confirm the "well-trauma" theory.

ACTION PLAN:

1. PREVENTION: All PCB containing electrical equipment has been removed from the plant; there is no longer any source of additional contamination.

2. CONTAINMENT: The PCB's are bound to the soil and are confined to the site. There is no exposure to employes or to the community. Therefore, there is no need at this time to install an additional containment system.

3. REMOVAL: ~~Because~~ there is no public health or environmental danger associated with the site, there is no compelling reason to remove any PCB contaminated soil. ~~at this time~~. ~~The~~ Removal of the PCB contaminated soil has more risk associated with it than ~~simply~~ leaving it in place.

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4. MONITOR: We will monitor the existing wells to detect any possible migration. As the floating organic material is removed, we will also periodically test the associated groundwater for presence of PCBs. In addition, we will ~~not~~ institute air monitoring to document that there is no exposure through the atmosphere.

We are submitting this information in the spirit of cooperation and intend to work with the New Jersey DEP in ensuring that the environment is protected.

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Plant Manager

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