

Monsanto

FROM (NAME & LOCATION) P. E. Heisler - W.G.K. Plant

DATE : 1/23/76

SUBJECT : PCB - FEDERAL EPA VISIT
Jan. 27, 1976

REFERENCE : Item (11) Harness' memo of 1/22/76

TO : A. E. Leisy
W.G.K. Plant

CC: R.W. Flint
A. Gallion
R.L. Harness
C.F. Buckley
M.R. Foresman
D.B. Hosmer - ElSF

This morning I talked with Roscoe Libby, Federal EPA, in reference to the questions outlined in the reference memo.

a) Exact Size of the Group

We now expect about six visitors total. He was told today there would only be one Illinois EPA visitor.

<u>Federal EPA</u>	<u>Water</u>	- Roscoe Libby - Joe Slobick
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Air - Ed Zilstra
- Chuck Miller

Solid Wastes - Jay Goldstein

State EPA - Larry Estep.

b) How many per shift

Apparently the scope of their visit has changed significantly. Mr. Libby stated the Air and Solid Wastes people would probably complete their work on the day shift. He stated the Water people would take "grab samples" at the manufacturing unit, the "Incinerator Scrubber" and the influent and effluent of the Sauget Village Waste Treatment Plant. It seemed obvious to me that someone in Monsanto (possibly Papageorge) had talked to him about the "Incinerator". He left me with the twice verified understanding that they would all be done by the end of the day shift. These "grab samples" would be taken about an hour apart.

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c) Approximate Length of Stay

About 8 hours although Mr. Libby was not sure what the Air people would do.

d) Equipment

They would bring all their own. They are bringing the "big" air unit which he thinks is completely self contained. Usually they can either hook into an extension outlet or generate their own power. He thinks their unit is explosion proof. I explained our Fire Permit requirement.

e) General

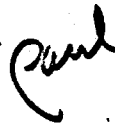
They will bring their identification as always.

They have a "questionnaire" that we will be asked to fill out. It is a "check list" from Washington used by the EPA for "Transformers and Capacitors". They used it yesterday at one of our customer's plant.

He had heard from Phocion Park on Wednesday. He referred Park and his questions about responsibility for damage to the trailer to the EPA legal people.

He also reminded me about "Section 72-500" which allows them access to our premises.

P. E. Heisler



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AGENDA FOR MEETING

1. EPA Input on Objectives
2. Plant Practices and Safety Rules
3. PCB Reduction/Control Activities
4. Organization for Completing Task

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PLANT PRACTICES

1. Guardhouse amenities
2. Safety equipment
3. Smoking
4. Visitors-area authorization and guides
5. Cafeteria
6. Cameras
7. Emergency alarms

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PCB LOSS CONTROL/REDUCTION

1. Containment of Leaks

- a. Pumps systems, buckets
- b. Pump repairs in dept. area
- c. Dry cleanup
- d. Proper maintenance of equipment
- e. N₂ pads on stg. tank vapor spaces
- f. Sample containers

2. Containment of Spills

- a. Sewers above ground
- b. Bathtub approach - tank car loading process
- c. Ejector discharges
- d. Operation of sumps

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PCB LOSS CONTROL/REDUCTION(Continued)

3. Control

- a. Dept. monitoring system
- b. Incinerator monitoring system
- c. Reporting
- d. Action limits

4. Process Streams

- a. Residues
- b. Off-gas cleanup

5. Disposal of Collected Material

- a. No reuse - quality considerations
- b. Incineration

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ORGANIZATION FOR COMPLETION OF TASK

1. Proposal to minimize number of people
required for 24 hour plus sampling

a. Land fill

b. H₂O team

c. Air team

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