JUN 10 1977

JUN 6 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John R. Eck, Managing Director
and Vice President
Monsanto Chemical Intermediates Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63166

Re: Request Pursuant to Section 308(a) of the Federal Water Pollution Control Act, As Amended, 33 U.S.C. § 1318(a)

Dear Mr. Eck:

Present information available to the United States Environmental Protection Agency (U.S. EPA) indicates that the Monsanto Chemical Intermediates Company at its William G. Krummrich facility is the principal discharger of polychlorinated biphenyls (PCB's) as well as other potentially toxic, persistent chemicals into the Village of Sauget, Illinois, Wastewater Treatment Plant. Monsanto has stated its intention to cease all production of PCB's by August 31, 1977, and to cease distribution by October 31, 1977. It has further expressed on several occasions its willingness to participate voluntarily in an information-gathering process.

Therefore, in order to obtain data required to help improve water quality, the following request for information is made pursuant to authority provided by section 308 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. § 1318.

1. Monsanto shall carry out the following monitoring program to determine what effect, if any, its PCB production and distribution elimination has on the PCB's discharged from Monsanto's facility. For a period of six months following receipt of this letter, Monsanto shall conduct the following PCB monitoring:

   A. Prior to PCB Production Shutdown (August 31, 1977):

	Sampling Location	Frequency	Sample Type
(1)	Monsanto Incinerator Discharge	1 x week	24-hour vertically Integrated Composite
(2)	Monsanto Combined Discharge	1 x week	24-hour vertically Integrated Composite

B. Subsequent to PCB Production Shutdown:

Sampling Location	Frequency	Sample Type

(1) and (2) as stated in I.A.

(3) Such other sampling as is needed to determine the existence of PCB contaminated sewers or runoff areas.

II. Monsanto shall provide the following information on all products, byproducts and intermediates produced at the William G. Krummrich facility in 1976 and/or 1977, excluding bench scale and pilot plant production, by no later than 90 days after receipt of this letter:

A. 1. The names of any products, byproducts, or intermediates not present in Attachment A (information submitted in response to an inquiry from U.S. EPA's Effluent Guidelines Division in Washington, D.C.);

2. All chemical compounds incorrectly included in Attachment A;

3. For each product, byproduct, or intermediate, a list of all raw materials used in the production process, including but not limited to reactants, solvents, catalysts, emulsifiers, and stabilizers;

4. For each product, byproduct, or intermediate, a general description of the production process unless a correct description is already given in Attachment A;

B. For each production process, a listing of all chemical substances, other than those provided in II.A. above, which Monsanto has reason to believe might be present in the waste stream based on a thorough examination of all possible side reactions, feedstock impurities, and other potential contaminants;

C. All results of any previous chemical analyses for specific chemical compounds, performed on any waste stream. Exclude any information already submitted in response to the above-mentioned Effluent Guidelines Division inquiry;

D. The quantity of each chemical compound in Attachment B which is present in the final discharge from the plant, as determined by analysis of a vertically integrated, 24-hour composite sample collected during a period of normal operation;

E. For each product or intermediate in Attachment C, the quantity of product, feedstock, and any related byproducts and intermediates present in the individual process wastewater stream, as determined by analyzing a vertically integrated, 24-hour composite sample collected following pretreatment but prior to mixing with any other waste streams.

Note: All chemical compounds shall be identified according to the IUPAC "Definitive Rules for the Nomenclature of Organic Chemistry" or equivalent standard chemical nomenclature. Abbreviations, trade names, and patent names are not sufficient.

III. Monsanto shall determine the physical integrity of the sewers within its control which carry production wastes from the Monsanto PCB production facility. The results shall be submitted no later than June 30, 1977.

IV. Monsanto shall also provide the following information with regard to PCB's:

A. Within 30 days of receipt of this letter, the total amount of PCB's currently being stored on site, the method and the location of storage;

B. Within 45 days of receipt of this letter, Monsanto's plan for the disposition of any PCB's not distributed after October 31, 1977; and

C. Within 45 days of receipt of this letter, a plan indicating the disposition of any PCB contaminated equipment and/or materials and/or the cleaning methods to be used to clean contaminated equipment. This includes on-site contamination and sewer contamination, as well as contaminated cleaning wastes.

V. A. The analytical and sampling methods used shall conform to 40 C.F.R. Part 136, 41 Federal Register 52780, dated December 1, 1976, which cites the following:

1. Standard Methods for the Examination of Water and Wastewater, 14th Edition, 1975, American Public Health Association, Washington, D.C. 20036.

2. A.S.T.M. Standards, Part 31, Water, 1975, American Society for Testing and Materials, Philadelphia, Pennsylvania 19103.

3. Methods for Chemical Analysis of Water and Wastes, 1974, U.S. Environmental Protection Agency, Office of Technology Transfer, Cincinnati, Ohio 45268.

Analytical procedures not covered in the above references can be obtained from the Environmental Monitoring and Support Laboratory, U.S. EPA, Cincinnati, Ohio 45268, (513) 684-7501. Different but equivalent methods are allowable if prior written approval from the U.S. EPA is obtained.

Monsanto shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation to insure accuracy of measurements.

B. Monsanto shall record for all samples the date and time of sampling, the sampling method used, the date analyses were performed, the identity of the particular method of analysis, and the results of all required analyses and measurements.

VI. The information requested herein must be provided notwithstanding its possible characterization as confidential or a trade secret. Should you so request, however, any information (other than effluent data, which by law must be made available to the public) which the Administrator of this Agency determines to constitute methods, processes, or other business information entitled to protection as a trade secret will be maintained as confidential, pursuant to the procedures specified in 40 C.F.R. Part 2 (41 Federal Register 35902, September 1, 1976). Please indicate clearly or submit separately any portion of the response you consider to be confidential or a trade secret, since any data not so identified will not be accorded this protection by the Agency.

VII. All reports and information required herein are to be submitted to the United States Environmental Protection Agency, Region V, Enforcement Division, Attention: Engineering Unit.

Very truly yours,

ORIGINAL SIGNED BY DALE S. BRYSON

Dale S. Bryson, Acting Director
Enforcement Division

Attachments (3)

cc: Mr. Phocion S. Park
Environmental Counsel
Monsanto Chemical Intermediates Company

Mr. Paul Saucet, Mayor
Village of Sauget, Illinois (w/o Attachments)

PRIVILEGED INFORMATION

Attachment A

Products and Processes at William G. Krummrich Facility of Monsanto Chemical Intermediates Co.

Product	Process
Orthonitroaniline	Ammonolysis of orthonitrochlorobenzene
Paranitroaniline	Ammonolysis of paranitrochlorobenzene
Orthodichlorobenzene	Chlorination of benzene
Pentachlorophenol	Chlorination of phenol
Sulfuric acid	Contact process, single adsorption
Chlorosulfonic acid	Reaction of HCl and sulfuric acid
Muriatic acid	Falling film adsorption
Paranitrochlorobenzene	Nitration of chlorobenzene
Chlorine	Denora cell
Potassium hydroxide	Danora cell
Sodium hydroxide	Denora cell
Monochlorobenzene	Chlorination of benzene
Parachlorophenol	Chlorination of phenol
Orthochlorophenol	Chlorination of phenol
2,4-Dichlorophenol	Chlorination of phenol
Orthobenzylparachlorophenol	Reaction of benzyl chloride and chlorophenol
Phosphorus trichloride	Chlorination of phosphorus
Phosphorus oxychloride	
Phosphorus pentasulfide	Reaction of phosphorus and sulfur
Polychlorinated biphenyls	Chlorination of biphenyl

PRIVILEGED INFORMATION

Attachment A (Cont.)

Product	Process
Dodecylaniline	
Parophenetidine	
N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine	
N,N'-bis(1,4-dimethylpentyl)-p-phenylenediamine	
Triphenyl phosphate	
Dry chlorine bleach	
4-nitrophenylamine	
Orthonitrophenol	
Sodium sulfite	Sulfur burning, NaOH adsorption
p-Tert-butylphenyl-diphenylphosphate	

PRIVILEGED INFORMATION

Attachment B

Analysis of Final Discharge from Plant

Orthonitroaniline

Paranitroaniline

Orthodichlorobenzene

Pentachlorophenol

Paranitrochlorobenzene

Monochlorobenzene

Parachlorophenol

Orthochlorophenol

2,4-Dichlorophenol

Orthobenzylparachlorophenol

Dodecylaniline

Paraphenetidine

N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine

N,N'-bis(1,4-dimethylpentyl)-p-phenylenediamine

Triphenyl phosphate

4-Nitrophenylamine

Orthonitrophenol

Nitrobenzene

Aniline

Orthonitrochlorobenzene

Paranitrochlorobenzene

Benzene

Biphenyl

1,4-Diaminobenzene

Paradichlorobenzene

Hexachlorobenzene

Chlorinated dibenzo-p-dioxin

Chlorinated dibenzofuran

MONS 202643

Attachment C

Products Designated for Process Waste Analysis

Orthonitroaniline

Paranitroaniline

Orthodichlorobenzene

Pentachlorophenol

Paranitrochlorobenzene

Monochlorobenzene

Parachlorophenol

Orthochlorophenol

2,4-Dichlorophenol

Orthobenzylparachlorophenol

Dodecylaniline

Parophenetidine

N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine

N,N'-bis(1,4-dimethylpentyl)-p-phenylenediamine

Triphenyl phosphate

4-Nitrophenylamine

Orthonitrophenol