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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

AUG 20 1976

Mr. Phocion S. Park
Environmental Counsel
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Dear Mr. Park:

Several items which surfaced at our July 21, 1976, meeting need further attention.

Mr. Howard Zar advised Mr. Robert Nelson, Monsanto Company, by telephone on July 23, 1976, that EPA would submit suggestions as to appropriate treatment practices that could be conducted by Monsanto during an interim period. These recommendations are as follows:

1. The use of a leased portable carbon absorption system such as that supplied by Calgon. One such system might be applied to the entire effluent or one each to the incinerator effluent and manufacturing area effluent. Presumably, any uncontaminated non-contact cooling water could be separated out in order to reduce the flow treated by the carbon absorption units.

2. The addition of powdered carbon to existing settling tanks or to new tanks obtained for that purpose.

We would be interested in your reaction to these suggestions. It is our opinion that the cost of these approaches is justified by the benefits of reducing Monsanto's existing PCB discharge to the Village of Sauget's sewage treatment plant of 1 to 2 pounds per day.

It appears to us that even after Monsanto ceases discharge of PCB's from its production activities that contaminated sewer lines, etc., resulting from past discharges will continue to cause a serious discharge of PCB's from the Village of Sauget's treatment plant. Does Monsanto have any suggestions as to the appropriate treatment means that might be applied by the Village in order to reduce present and future discharges of PCB's to the Mississippi? In addition, would Monsanto suggest appropriate locations and frequencies for monitoring its discharge of PCB's into the Village's treatment plant?

DSW 012617

It was tentatively agreed that some language should be included in the Village of Sauget's NPDES permit regarding PCB's. We suggest the following be added as a special condition:

1. In order to minimize the discharge of PCB's from permittee's sewage treatment facility, permittee shall prohibit the introduction of PCB's into its sewage treatment facility resulting from Monsanto's production of PCB's by no longer than December 31, 1977.

2. In order to minimize the amount of PCB's introduced to permittee's sewage treatment facility, Monsanto agrees to cease the production of PCB's by _____, 1977. Within ninety (90) days following this date, Monsanto shall begin to dismantle its PCB production facility.

Please remember that Monsanto agreed to submit within thirty (30) days of our July 21, 1976 meeting, air data, results of its own sampling taken when EPA took samples, and recent monitoring data which forms the basis of Monsanto's estimate that it discharges only 1 to 2 pounds of PCB's per day.

An early response to this letter would be greatly appreciated.

Very truly yours,

Roy M. Harsch

Roy M. Harsch, Attorney
Enforcement Division, Region V

cc: Mr. Robert Nelson
Monsanto Company

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