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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 27 1977

Honorable Paul Sauget
Mayor of Sauget
Sauget, Illinois 62201

Re: Request Pursuant to Section 308(a) of the Federal Water Pollution Control Act, As Amended, 33 U.S.C. § 1318(a) and Section 114 of the Clean Air Act, As Amended, 42 U.S.C. § 1857(c)-9

Dear Mayor Sauget:

Present information available to the United States Environmental Protection Agency (U.S. EPA) indicates that the Village of Sauget is discharging polychlorinated biphenyls (PCB's) from its outfalls 001 and 002 into the the Mississippi River. In addition, due to the principally industrial character of the wastes received by the Village treatment system, it may be expected that other potentially toxic, persistent chemicals are being discharged unidentified through the outfalls. In order to help achieve this Agency's Congressional mandate of restoring and maintaining the chemical, physical and biological integrity of the nation's waters by setting reasonable pretreatment and effluent limitations, it is extremely important that a precise analysis be made of the discharges.

Therefore, pursuant to the authority provided by section 308 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. § 1318, and section 114 of the Clean Air Act, as amended, 42 U.S.C. § 1857(c)-9, I request that the following investigation, including sampling and monitoring, be conducted by the Village and the reports thereof be submitted to me by the dates specified herein:

1.A. Sauget shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge. Monitoring data shall be summarized on an average calendar month basis, and individual reports for such summaries are to be submitted on a monthly basis to the United States Environmental Protection Agency, Region V, Enforcement Division, Attention: Engineering Unit.

Monitoring as described herein is required for discharge 001, and for 002 only when overflow occurs. Both discharges shall be monitored until December 31, 1977.

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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, 1976, 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 45202.

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) 682-7301. Different but equivalent methods are allowable if prior written approval from the U.S. EPA is obtained.

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

B. The data collected and submitted shall be taken at the following test frequencies and shall include the following parameters:

(mg/l Except Where Indicated)	Frequency	Sample Type
Total Flow, mgd	Daily	Continuous
BOD, 5 day	Daily	24-Hour Composite
Suspended Solids	Daily	24-Hour Composite
pH (Units)	Daily	Continuous
Fecal Coliform, N per 100 ml	1 x Weekly	Grab
COD	Daily	24-Hour Composite
Total Dissolved Solids	2 x Weekly	24-Hour Composite
Oil and Grease	2 x Weekly	Grab
Total Copper	2 x Weekly	24-Hour Composite
Cyanide	2 x Weekly	24-Hour Composite
Total Mercury	2 x Weekly	24-Hour Composite
Total Lead	2 x Weekly	24-Hour Composite
Total Zinc	2 x Weekly	24-Hour Composite
Total Nickel	2 x Weekly	24-Hour Composite
Total Iron	2 x Weekly	24-Hour Composite
PCB's	1/	1/

1/See Part II.A. for PCB monitoring requirements.

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Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

Effluent values are to be determined by a 24-hour composite sample consisting of several effluent portions collected in a 24-hour period and composited according to flow. For fecal coliform bacteria, a sample consists of one effluent portion collected during a 24-hour period.

C. The date and time of sampling, the sampling method used, the date the analysis was performed, the analytical test procedure used, the name of the analyst performing the test, the name and address of the laboratory where the test was performed, and the result of the required analysis shall be recorded for each sample.

II. Based upon present information, Monsanto Chemical Intermediates Company appears to be the principal discharger of PCB's into the Sauget treatment plant. Monsanto has stated its intention to cease all production of PCB's by August 31, 1977, and has further stated it will cease distributing PCB's by October 31, 1977.

Sauget shall carry out the following monitoring program to determine what effect, if any, this PCB production and distribution elimination program has on the PCB's discharged from Sauget's Sewage Treatment Plant:

A. Prior to PCB production shutdown

Polychlorinated Biphenyls

Sampling Location	Frequency	Sample Type
1. Sauget Effluent	1 x Week	24-Hour Vertically Integrated Composite
2. Sauget Influent	1 x Week	24-Hour Vertically Integrated Composite
3. Sauget		
a. Separated Oil and Grease	As necessary to establish a mass balance at the Sauget Sewage Treatment Plant and an average concentration.	
b. Sludge		
4. Dead Creek and 18" Village Sewer	As necessary to establish average loads from these sources.	

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B. Subsequent to PCB Production Shutdown

Polychlorinated Biphenyls

Sampling Location	Frequency	Sample Type

Same requirements as stated in II.A.1.-4. above.

5. Such other sampling as is needed to determine the existence of contaminated sewers or runoff areas.

III. Sauget shall determine the physical integrity of the sewers which carry the production wastes from Monsanto's PCB facility to the Sauget Wastewater Treatment Plant and submit the results no later than June 30, 1977.

IV. A. The following information regarding all sludges, slurries, screenings, and other solids which are generated by the treatment facilities shall be submitted no later than June 30, 1977:

1. The amount of sludges, screenings, slurries, and other solids collected on a daily, monthly or annual basis;

2. The name and address of each sludge transporter, the methods of transportation, and the amounts of sludge transported; and

3. A description of the ultimate sludge disposal, including the site and method of actual disposal.

B. The following information regarding all separated oil and grease generated by the treatment facilities shall be submitted no later than June 30, 1977:

1. The amount of waste oil and grease collected on a weekly, monthly or annual basis;

2. The name and address of each waste oil and grease transporter, the method of transportation, and the amounts of waste oil and grease transported; and

3. A description of the ultimate waste oil and grease disposal, including the site and method of actual disposal.

V. For each industrial facility which discharges industrial wastewater to the Sauget collection system, Sauget shall provide all of the following information no later than September 1, 1977:

A. For each full-scale production operation:

1. A general description of the production operation;

2. The identity of the product(s) and, if a chemical, the chemical name and formula using standard chemical nomenclature;

3. The identity of all raw materials used in the production operations and if a chemical, the chemical name and formula using standard chemical nomenclature;

B. All chemical substances, other than those listed in item (A) above, which the industrial facility has reason to believe might be present in the industrial wastewater, based on a thorough examination of the production operations. For chemical operations, this shall include all possible side reactions, feedstock impurities, or other possible contaminants;

C. The daily volume of wastewater discharged to the Sauget collection system;

D. All results of any chemical analysis which has been performed on the wastewater stream; and

E. A description of any pretreatment which is provided by the industrial facility.

VI. The information requested must be provided notwithstanding its possible characterization as confidential or a trade secret. Should you so request, however, any information (other than effluent or emission 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 36902, 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,

David Kee, Acting Director
Enforcement Division

cc: Mr. Richard J. Kissel
Martin, Craig, Chester & Sonnenschein

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