PLAINTIFF'S EXHIBIT 3

9-9-85 1/3

Subject: Monsanto/Snow Creek PCBs - Anniston, AL
From: Henry Hudson
To: File

I met this afternoon with John Johnson (ORC), Ray Wilkerson (ICS), Ralph Jennings, and Craig Kniesel (AL AGO). Craig discussed his activities and data on this site. An initial survey of stream sediment from a tributary to Snow Creek and from Snow Creek, all below the Monsanto plant was taken by ADEM (or the AGO); it showed PCBs ranging up into the hundreds of ppm in the tributary (which is about ½ mile long and is essentially Monsanto's cooling water) and Snow Creek (for at least a mile, probably a good bit more).

In the AGO's first meeting with Monsanto, Monsanto's Chief Counsel said he didn't believe the state's data, so Monsanto resampled, not at exactly the same locations, but close. Monsanto's results were even higher than the state's, with the highest result being about 1250 ppm.

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Monsanto has proposed bulldozing with clay over the affected stream bed and running the creek through a culvert they would install in place of that portion of the creek. Craig said ADEM did not seem averse to this approach but he was not pleased with it.

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We discussed the various limits on PCBs -

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says at the concentrations we have here, there should be acou ~~soupp~~ ~~in~~ ~~the~~ water, ~~enough to load up~~ the fish in th fishing creek that Snow Creek flows into. (Chockalocka

Wilkerson described the listing procedure for the NPL and the RI/FS process. He said it might rank out, but perhaps not if there's no "target" such a a water intake, within 3 miles. He said the ICS would do a PA and an SI shortly, and it was agreed that this work would be coordinated with the AL AGO and ADEM, all of whom would participate in the field work.

Craig said that he would write Monsanto now & tell them that their proposal is not yet approved, tha EPA is interested/concerned/involved, and that there will have to be further discussions on the matter before a remedy can be effectuated.

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I didn't make a commitment ~~about any~~ immediate removal, but I noted that we have an environmental/food chain threat, and that it looked likely to be a project that could exceed $1 million. It would appear that the stream would have to diverted in order to remove the contaminated sediment without ~~[illegible]~~ resuspending the PCB

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After the meeting, Ray & I met with John & discussed the unusual aspect of the AGO's spearheading the project, which falls under ADEM authority. The AGO's grounds for a case are based on trespass that resulted in deposition of PCB into

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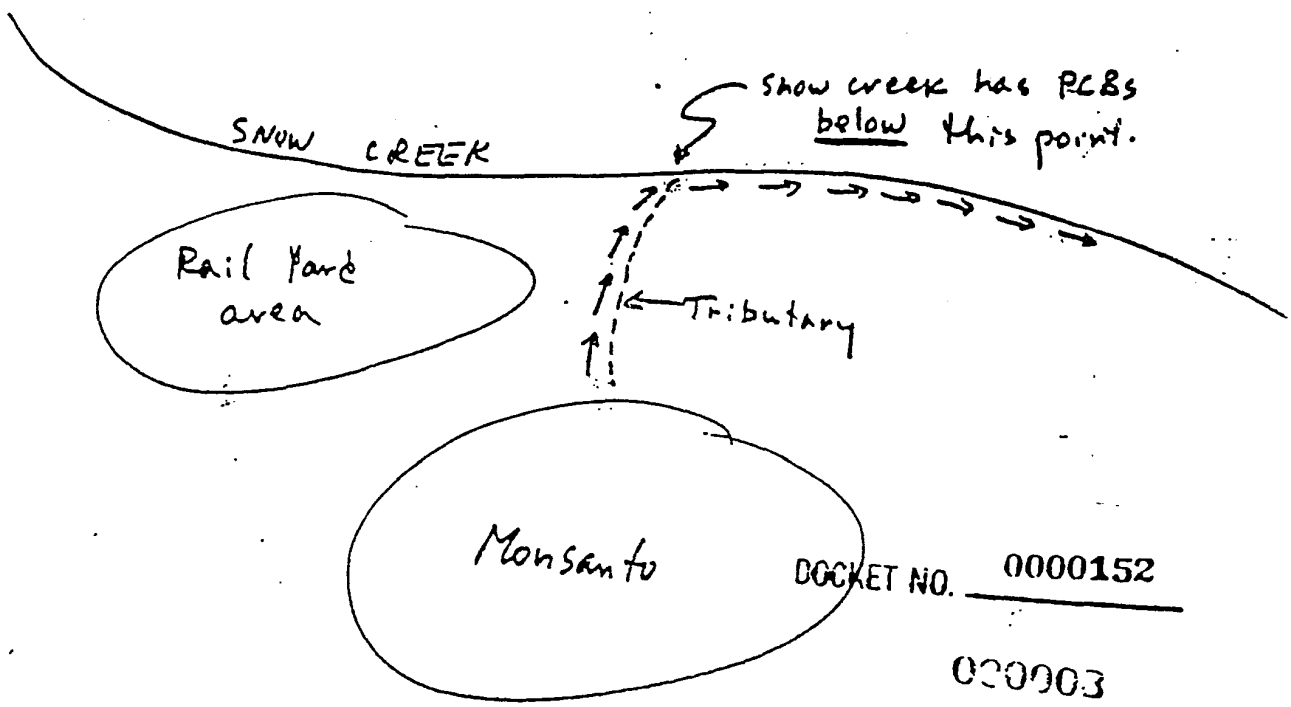
Regarding a potential immediate removal, we could act now + sample the stream ourselves, or we can wait for the results of the PA/SI and even the ranking of the site for the NPL. (Ray said it sometimes takes nearly a year to get the ranking done.)

Henry Hudson

cc: George Mocia
Fred Strand
John Johnson (ORC)
Ray Wilkerson
Ralph Jennings



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Note: Several churches shown in the area on ADO's map. ADO says area residents are on city water.

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