Attach. #

Monsanto

MAR 02 19

FROM
NAME - LOCATION - PHONE
D. B. Redington - C2SB - 4-4956

DATE
February 26, 1987

SUBJECT
Environmental Status
-- Anniston Plant

REFERENCE

TO
R. G. Potter/G4NH
N. L. Reding/C2NA

H. J. Corbett/D1D
R. L. Fields/C2NJ
R. L. Harness/C2NA
V. T. Matteucci/G5NR
D. D. Mickelson/C2NA

The status of environmental programs and issues at the Anniston Plant was reviewed with Mr. Hal Corbett on February 26, 1987. In view of the present indicated direction of transferring management responsibility for the plant from MAC to MCC, our objectives were to inform Hal of the present environmental setting and direction of the plant and to ascertain any corporate environmental reservations or concerns relative to that transfer.

Dennis Redington of MAC Environmental Affairs reviewed plant status vs. our internal guidelines, and discussed on-going activities to further advance environmental programs at the plant as part of the 1987-88 project for site consolidation -- given the demise of parathion manufacture at the site. Site consolidation is funded by the MAC restructuring reserve and is expected to leave an unexpended variance of about $2 M in the environmental sector of the reserve. In addition to costs for consolidation, MAC expects to incur on-going costs in the range of $400 k per year for environmental remedial requirements. Copies of Denny's presentation materials are attached.

A number of future potential environmental issues were identified, which will require continued monitoring and sensitivity. Hal agreed, however, that the plant's assessment, program and corrective action efforts are doing about what should be done given our understanding of site issues. It is further understood that costs for remedy of any future environmental issues that emerge will be borne by the operating companies in proportion to cause. We should continue to maintain a cooperative interaction with the regulators, and to be responsive to local community attitudes to stay ahead of and defuse these future concerns.

D. B. Redington

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M. A. Pierle

M. A. Pierle

DBR-MAP:jb

PLAINTIFF'S EXHIBIT

404

DSW 119459

ANNISTON PLANT

WORLDWIDE
GUIDELINE STATUS

#1
- WATER ASSESSMENT - 6/84 PLAN
  - ESSENTIALLY CURRENT
  - NEEDS TO BE RE-DONE
- AIR ASSESSMENT - 2/6/87 REVISION
- NO NPDES VIOLATIONS
- 2-7 TSS VIOLATIONS/YR - POTW
- 1-4 AIR EXCEEDANCES/YR - FLARE BYPASS
- NO CERCLA REPORTS

#2
- IN ESSENTIAL COMPLIANCE WITH ACUTELY HAZARDOUS/ INCINERABLE TIMETABLE
- ACTIVE SUPPORT OF HAZARDOUS WASTE DATA BASE/REDUCTION

#3
- LAST ENVIRONMENTAL AUDIT - 4/85
- LAST GROUNDWATER ANNUAL REVIEW - 10/84
- LAST ASSESSMENT UPDATE - 1/83
- I/M PLAN FOR UG STRUCTURES - 6/28/85

#5
- 6 OP'S USED AND LISTED
- MINOR USE
- 5/6 ASSIGNED TO OTHERS
- AUDITS ESSENTIALLY CURRENT (10/86-5/88 NEXT)
- 5/6 UNDER CONTRACT

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ANNISTON ENVIRONMENTAL REVIEW

ENVIRONMENTAL ELEMENTS
OF
SITE CONSOLIDATION

	$ K
1. DISMANTLEMENT - 12/87	
• 4 PCB TRANSFORMERS	60
• NUCLEAR INSTRUMENTS	6
• UPGRADE 1600 FT. SEWERS	383
• ASBESTOS, P4, MAT'LS DISPOSAL	111
• DECONTAMINATION FOR DISPOSAL/SALE	120
• CONSOLIDATE WTP CONTROL ROOM	92
• MODIFY RCRA DRUM STORAGE	15
2. RCRA CLOSURES	
• LIMESTONE BED - 1/88	104
• LANDFILL - 6/88	150

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		$ K
3.	RCRA REMEDIAL ACTION	
	• LIMESTONE BED - 6/88	100
	• OLD LANDFILL CELLS - 12/87	90
4.	ADDED MONITORING WELLS - 12/87	80
	• 3 RCRA (DEEP)	
	• 4 VOLUNTARY (2 DEEP, 2 SHALLOW)	
5.	PCB REMOVAL -- SNOW CREEK	ERAP
6.	EXCESS WTP OPERATION TO FACILITATE SHUTDOWN	1370
7.	SHARE OF PROJECT ADMIN	315
	BUDGET ESTIMATE	2996
	RESERVE ALLOWANCE	4900
	PLAN VARIANCE	1904

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ANNISTON ENVIRONMENTAL REVIEW

EXPECTED MAC COST BURDEN
FOR
ON-GOING OPERATIONS

		$ K/YR
1.	LANDFILL POST-CLOSURE MONITORING	17[1]
2.	LIMESTONE BEDS POST-CLOSURE MONITORING	9[1]
3.	LANDFILL AND LIMESTONE BEDS REMEDIAL ACTION	300
4.	CONTINGENCY (FUTURE PART B NEEDS)	74
		$400

[1]COVERED BY RCRA ACCRUAL

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ANNISTON ENVIRONMENTAL REVIEW

FUTURE
POTENTIAL PROBLEMS

1. CHLORINATED HYDROCARBONS IN GROUND WATER

2. DEEP GROUNDWATER

3. OLD FERRO-MANGANESE LANDFILL

4. POTENTIAL FUTURE MOBILIZATION OF SOIL CONTAMINANTS

   - PCB'S
   - MERCURY
   - ORGANOPHOSPHATES
   - PNP
   - OTHER

RESOLVED:

ANY FUTURE ENVIRONMENTAL COSTS TO BE BORNE BY OPCO MOST CLOSELY RELATED TO CAUSE

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ANNISTON PLANT

CHLORINATED ORGANICS
IN
GROUNDWATER

DATE	WELL	PPB	FOUND
4/82	MW-7	11	1,2-DICHLOROETHENE
		48	TRICHLOROETHENE
	MW-8,9	—— CLEAN	——
3/83	MW-7,8,9	—— CLEAN	——
4/84	MW-7	—— CLEAN	——
	MW-8	TR	1,1,2,2-TETRACHLOROETHANE
	MW-9	TR	METHYLENE CHLORIDE
5/85	MW-7	7	1,2-DICHLOROETHENE
		18	TRICHLOROETHENE
		29	1,1,2,2-TETRACHLOROETHANE
6/85	PROD'N	5	CARBON TETRACHLORIDE
		4	CHLOROFORM
		10	METHYLENE CHLORIDE
		31	TRICHLOROETHYLENE
		TR	BENZENE
2/86[1]	PROD'N	NO	CARBON TETRACHLORIDE
		3,4,4	CHLOROFORM
		282,41,13	METHYLENE CHLORIDE
		9,16,16	TRICHLOROETHYLENE
		8,6,6	BENZENE

[1]THREE SUCCESSIVE SAMPLES

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