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Exhibit 3.0

CONFIDENTIAL BUSINESS
INFORMATION

Pursuant to 40 CFR Part 2, Subpart B, Monsanto Company hereby asserts a business confidentiality claim covering this Exhibit and all documents attached thereto.

ESPK464A.ch

MONSANTO'S RESPONSE TO REQUEST FOR
INFORMATION CONCERNING SAUGET AREA I
SAUGET, ILLINOIS

GENERAL OBJECTIONS

Monsanto generally objects to the overly broad, unauthorized and unduly burdensome nature of the questions included in the July 13, 1994 Request for Information on the Site referenced above, as propounded by the U.S. Environmental Protection Agency (EPA). Monsanto objects to the extreme breath of information sought insofar as the questions fail to limit the scope of inquiry to the transport, storage, treatment or disposal of hazardous substances, as defined in 42 USC § 9601(14) (hazardous substance), at or to the Sauget Area I Site in Sauget and Cahokia, Illinois (Sauget Area I Site). The questions as propounded are in excess of EPA's authority for purposes of information requests under CERCLA Section 104(e) concerning a hazardous waste site. Furthermore, there is no showing that the individual propounding these requests on behalf of EPA possesses the requisite authority to make such requests pursuant to CERCLA. Monsanto also objects to the definitions and instructions included in the Request for Information as exceeding the scope of EPA's authority for purposes of such an information request.

Given the extreme periods of time (some 9 decades), the undefined nature of questions and the existence of multiple lawsuits which may pertain to some aspects of the questions as propounded (including but not limited to People of the State of Illinois v.

Monsanto Company, No. 82-CH-195, 20th Judicial Circuit, St. Clair County, Illinois; Cerro Copper Products Company v. Monsanto Company and Monsanto Chemical Company, No. 92-CV-204-WDS, (U.S.D.C. SD IL); and, Monsanto Company v. Aetna Casualty and Surety Company, et al., C.A. No. 88C-JA-118-1-CV, Superior Court, New Castle County, Delaware), various communications and documents are not subject to disclosure on the basis of irrelevance, overbroadness, lack of competent authority, attorney-client communications, attorney work product, self-critical analysis and/or settlement negotiations.

Monsanto states that the objections set forth above are continuing in nature and, to the extent applicable, shall be deemed included in every Monsanto answer below, whether or not specifically set forth. Monsanto does not waive the right to raise additional objections as appropriate at a later time.

RESPONSES

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

   RESPONSE: Monsanto consulted with a number of individuals/entities in the preparation of the factual answers to these Information Requests. Certain consultations are privileged as attorney work product and attorney-client communications as Monsanto attorneys, outside counsel and their staffs were utilized to develop

various issues. Without waiving any applicable privilege, the following persons were consulted as to factual matters:

Charles Deubner
223 Turf Ct.
Webster Groves, MO 63119

M. R. Foresman
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

P. E. Heisler
19 Germania
Columbia, IL 62236

M. W. McCombs
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

K. S. Miller
W. G. Krummrich Plant
Monsanto Company
Route 3
Sauget, IL 62206

Stanley Perrin
720 State Street
Dupo, IL 62239

R. H. Sinise
12884 Castleton Ct.
Creve Coeur, MO 63141

S. D. Smith
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

W. L. Smull
8420 Woodbend Trail
Knoxville, TN 37919

Louis Sprandel
8115 University Drive
Clayton, MO 63105

Benjamin Williams
370 S. Maple
Webster Groves, MO 63119

To the extent that the individuals named above are Monsanto employees, any contacts with them must be arranged through Stephen P. Krchma, Environmental Counsel, Monsanto Company, 800 N. Lindbergh Blvd., St. Louis, MO 63167, 314/694-1278.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents, clearly indicating on each document the questions to which it is responsive.

RESPONSE: Voluminous documentation was reviewed in order to fully identify sources of information for answers to these requests. Such documents include, but were not limited to, information already available to EPA:

a. Monsanto's prior responses, dated October 24, 1989, to Illinois Environmental Protection Agency (IEPA) Request for Information, L1630200005--St. Clair County, Sauget Sites--Areas I and II; and dated July 2, 1987 to EPA Request for Information on Dead Creek--Area G, Sauget Site, Sauget, Illinois.

b. Documents previously produced to the State of Illinois in Illinois v. Monsanto, Docket No. 82-CH-195, Circuit Court for the 20th Judicial District, St. Clair County, Illinois.

c. Documents previously furnished in Monsanto's initial response to this Information Request, dated August 24, 1994.

d. Documents previously made available for EPA inspection relating to the document production in Cerro Copper Products Company v. Monsanto Company and Monsanto Chemical Company, No. 92-CV-204-WDS (USDC S.D. IL).

e. Documents previously provided to EPA and state agencies in relation to compliance with Resource Conservation and Recovery Act (RCRA) and related corrective action at the Krummrich and Queeny plants.

f. Documents previously provided to IEPA in relation to investigations of the Sauget Area I Site.

Other documents reviewed were irrelevant to the issues at the Sauget Area I Site or were privileged as referenced in the General Objections above. Documents which were otherwise responsive to the questions are attached hereto or are otherwise identified. Certain depositions as taken in

Information Request or who may be able to provide additional responsive documents, identify such persons and where they can be contacted.

RESPONSE: To the extent that other persons may be able to provide a more detailed or complete response to a particular Information Request or may be able to provide additional responsive documents, such persons are identified in the documents which are provided/referenced herein.

4. List the EPA Identification Numbers of the Respondent.

RESPONSE: Monsanto has EPA Identification Numbers for many of its facilities throughout the nation, which facilities have no relationship to the Sauget Area I Site and are, therefore, irrelevant. The EPA Identification Number of the Krummrich plant is ILD000802702. The EPA Identification Number for the Queeny plant is MOD004954111.

5. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of material at the Site or at the facilities, particularly those who worked for Monsanto during the period prior to 1967.

RESPONSE: Given the manufacturing history of the Krummrich and Queeny plants which date back some sixty (60) years from 1967, the identity of such persons must be derived mostly from existing documentation which is otherwise provided/ referred to herein. See also the Response to Request No. 1. Generally, the plant managers and environmental superintendents for the periods in question are identified in Exhibit 3.1. However, the extent of information, which such individuals possess on relevant issues during these early time periods, is limited.

6. Identify the acts or omissions of any person, including your employees, contractors, or agents, that caused or may have caused the release or threat of release of hazardous materials from the facilities, as well as any damages resulting therefrom.

RESPONSE: At various times over the nine decades of manufacturing activities at the Krummrich and Queeny plants, spills or other releases have occurred and been reported to appropriate authorities, as required or otherwise appropriate. To the extent that this Information Request seeks information as to releases or threats of release without reference to the Sauget Area I Site, Monsanto objects that the Request is overbroad, is without competent authority, and is seeking irrelevant information. To the extent that information is sought as to releases into the

Sauget Area I Site, any such information is provided in Monsanto's "Response to Request for Information Concerning Sauget Area I, Sauget, Illinois" (Responses) below and the documents as provided/referenced herein.

7. Identify all persons, including yourself, who have arranged or may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment, of hazardous materials ("materials") at or to the Site, with particular attention to persons who performed these duties prior to 1967. In addition, identify the following:

   a. The persons with whom you or such other person(s) made such arrangements;

   b. Each date on which such arrangements took place;

   c. For each transaction, the nature of the material, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the material was used or the process which generated the material;

   d. The owner of the materials so accepted or transported;

e. The quantity of the materials involved (weight or volume) in each transaction and the total quantity for all transactions;

f. All tests, analyses, and analytical results concerning the materials;

g. The person(s) who selected the Site as the place to which the materials were to be transported;

h. The amount paid in connection with each transaction, method of payment, and identity of the person from whom payment was received;

i. Where the person(s) identified in g., above, intended to have such materials transported and all evidence of this intent;

j. Whether the materials involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

k. What was actually done to the materials once they were brought to the Site;

l. The final disposition of each of the materials involved in such transactions;

m. The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the materials involved in each transaction;

n. The type and number of containers in which the materials were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;

o. The price paid for (i) transport, (ii) disposal, or (iii) both of each hazardous material;

p. Copies of all documents containing information responsive to a - o above;

q. All persons with knowledge, information, or documents responsive to a - p above.

RESPONSE: Monsanto is not presently aware of sources of information which provide the amount of detail sought in Request No. 7 for transactions from 25 to 90 years ago. Those sources which may have any knowledge or information are identified in the Responses and documents as provided/ referenced therein.

8. Provide a detailed listing of products, including by-products, manufactured or produced at the facilities for the

time period 1900 - 1982. Include a listing of products and by-products manufactured at a former unit of the Monsanto Krummrich facility (e.g., the "U.S. Chemical Warfare Service Plant") now occupied by Ethyl Petroleum Additives, Inc. and any and all documents or information, whether sealed or not, concerning the U.S. Chemical Warfare Service Plant's waste disposal policies and/or practices.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

9. Describe manufacturing and recycling processes for each group of chemicals produced at the facilities from 1900 - 1982.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until

1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

10. Identify the raw chemical products received (e.g., benzene, chlorine, acids, etc.) at each of the facilities and the additives and catalysts used to produce finished products.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

11. The Krummrich facility evidently began operations at its present location in the early 1900's. Provide all information relating to the processes used at the Commercial Acid Works or the Indiahoma Oil Refinery. Identify all documents concerning the wastes generated at these two plants prior to Monsanto's use of the property.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing

operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

12. List the specific types of organic and inorganic substance used or generated at the facilities up until 1982, along with the specific time periods in which each was used or generated:

a. Provide the weight and/or volume of the total quantity of each organic or inorganic substance used or generated at the facilities;

b. Describe the nature of the substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and;

c. Describe the process for which the substance was used or the process which generated the substance.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment

or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

13. Were off-specification products treated as wastes at the facilities? Provide information and documents concerning Monsanto's treatment and disposal practice or policy concerning off-specification products.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

14. It has been estimated that 70% of Monsanto's hazardous waste is sold as by-products to other firms. Describe Monsanto's practice of selling by-products to other companies or transferring by-products to other Monsanto plants.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks

information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. The source or time period of the estimate cited in Request No. 14 is not clear. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

15. List the other companies or other Monsanto plants to which Krummrich by-products have been sold or transferred and list the types of by-products sold or transferred. Identify any by-products the Krummrich's facility receives from other Monsanto plants. Describe what these by-products are and their uses.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

16. As the Krummrich and Queeny facilities evolved over the years, how has the disposal of obsolete process equipment been handled? Describe the disposition of such equipment.

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

17. Describe the methods used to handle contaminated soil, contaminated clothing/protective gear, and laboratory wastes at the facilities. Were these items commingled with undefined hazardous or non-hazardous materials before disposal?

RESPONSE: Monsanto objects that this Request is irrelevant, overbroad and without competent authority as it seeks information concerning eight decades of manufacturing operations back to 1900 without any reference to treatment or disposal of hazardous substances in the Sauget Area I Site. Monsanto did not even own the Krummrich plant until 1917. However, to the extent that such information is readily available, it is provided in Exhibit 3.2.

18. Were any hazardous materials generated or used at the facilities disposed of on facility property? Were disposal activities carried out by Monsanto employees or outside personnel or waste contractors? For all disposal activities carried out by non-employees, please state which party (or parties) carried out these activities.

RESPONSE: Monsanto objects that this Request does not seek information related to the disposal or treatment of material in the Sauget Area I Site. Disposal activities on Queeny or Krummrich property are the subject of separate proceedings pursuant to the Resource, Conservation and Recovery Act (RCRA). Information relating to such activities have been provided to appropriate state and/or EPA offices and are available for review at those offices. Disposal in the Krummrich Landfill, which is not in the Sauget Area I Site, is the subject of People of the State of Illinois v. Monsanto Company, 82-CH-195, 20th Judicial Circuit, St. Clair County, Illinois.

19. Does Monsanto disagree with the contention that at least a portion of the Sauget Area I sites contain wastes generated from its manufacturing processes at either or both of the Queeny or Krummrich facilities? If Monsanto so disagrees, provide all information and documentation which supports this position.

RESPONSE: Monsanto objects that this is a request for admission, not information. Monsanto's agreement or disagreement is a matter of legal conclusions and/or argument. As such, this Request does not seek information which EPA is authorized to obtain pursuant to Section 104(e) of CERCLA. Information pertinent to this Request is supplied in Responses to the other Requests herein and in the documents as provided/referenced.

20. Does Monsanto disagree with the contention that at least a portion of the chlorobenzenes, chlorophenols, chloroanilines, nitrophenols, nitroanilines and/or PCBs which have been found to exist in Sauget Area I sites was used, or generated at its Queeny or Krummrich facility? If Monsanto so disagrees, provide all information and documentation which supports this position.

RESPONSE: Monsanto objects that this is a request for admission, not information. Monsanto's agreement or disagreement is a matter of legal conclusions and/or argument. As such, this Request does not seek information which EPA is authorized to obtain pursuant to Section 104(e) of CERCLA. Information pertinent to this Request is supplied in Responses to the other Requests herein and in the documents as provided/referenced.

21. Does Monsanto disagree with the contention that at least a portion of the wastes found to be present at Site R in Sauget Area II chemically matches the wastes found at Site G in Area I? If Monsanto so disagrees, provide all information and documentation which supports this position.

RESPONSE: Monsanto objects that this is a request for admission, not information. Monsanto's agreement or disagreement is a matter of legal conclusions and/or argument. As such, this Request does not seek information which EPA is authorized to obtain pursuant to Section 104(e) of CERCLA. Information pertinent to this Request is supplied in Responses to the other Requests herein and in the documents as provided/referenced.

22. Identify all waste disposal contractors employed or used by Monsanto for the period ending in 1967. Also:

a. Describe how these disposal contractors handled Monsanto's non-hazardous and hazardous materials, including the terms of any contractual arrangements with each;

b. Describe how Monsanto controlled where and how these waste disposal contractors disposed of these materials;

c. Was it Monsanto's practice or policy to dictate or choose where these materials would be disposed of or did Monsanto leave the disposal of the materials up to its waste disposal contractors?

RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

23. Did Monsanto or any of its consultants, agents, or contractors at any time secure the services of Leo Sauget or his company (later named "Industrial Salvage & Disposal, Inc.") to process, accumulate, treat, remove, haul or dispose of any hazardous materials and/or fly ash Monsanto generated or used at either the Queeny or Krummrich facilities? If so, describe the nature of these services, when they were rendered, and all contracts or agreements associated with these service. In particular, describe the arrangement with this company regarding where these materials and/or fly ash were to be disposed of.

RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

24. Did Monsanto or any of its consultants, agents, or contractors at any time secure the services of Paul Sauget or Sauget & Company to perform the services referenced in 23., above? If so, describe the nature of these services, when they were rendered, and all contracts associated with these services. In particular, describe the arrangement with this company regarding where Monsanto's wastes and/or fly ash were to be disposed of.

RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

25. Did any Monsanto employee, contractor, or agent, directly or indirectly, coordinate, manage or in any way oversee any waste disposal activities on any Leo Sauget or Paul Sauget-owned properties included within the Area 1 sites?

RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

26. Answer Requests 22 - 24 above regarding the U.S. Chemical Warfare plant and wastes generated at this facility.

RESPONSE: Monsanto has not located any information as to the U.S. Chemical Warfare Plant other than referenced above in the Response to Request No. 8. See Exhibit 3.2.

27. Did Monsanto or any of its consultants, agents, or contractors at any time secure the services of Harold Waggoner or Waggoner & Company to process, treat, accumulation, move, haul, or dispose of hazardous materials and/or fly ash generated or used at the facilities? If so, describe the nature of these services and all contracts or agreements associated with these services. Also describe the arrangement with this company regarding where these materials and/or fly ash were to be disposed of.

RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

28. Identify any and all trucking firms or disposal contractors hauling Monsanto chemicals, chemical wastes, by-products or off-specification products that have used any services of Harold Waggoner or Waggoner & Company, Leo Sauget, Paul Sauget, Industrial Waste Salve Inc., or Sauget & Company. Provide all contracts or arrangements associated with these services.

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RESPONSE: Information concerning waste disposal contractors is contained in Exhibit 3.3 and documents as otherwise referenced/provided herein.

29. Describe in detail the methods used at the Krummrich facility for handling process wastewater and sanitary discharges prior to the plant's hooking up to the Village of Sauget's (then the Village of Monsanto's) process water sewer interceptor system. When did the plant hook up to this system?

RESPONSE: Information as to the methods used at the Krummrich plant for handling process wastewater and sanitary discharges both prior to and after the plant's connection to the Village of Sauget sewer system in about 1933 are described in Exhibit 3.4 and documents as otherwise referenced/provided herein.

30. Describe how the interceptor junction structure at the north end of Dead Creek in the sewer system worked after the hook up to the Physical/Chemical plant. Identify the number of bypasses of the interceptor system which have occurred and the volume of wastewater discharged in each bypass event. Describe under what conditions the bypasses occurred, as well as nature of the wastewater discharged and area where

these wastewaters went during and after bypass events. When was this bypass point closed and what prompted its closure?

RESPONSE: Information as to the methods used at the Krummrich plant for handling process wastewater and sanitary discharges both prior to and after the plant's connection to the Village of Sauget sewer system in about 1933 are described in Exhibit 3.4 and documents as otherwise referenced/provided herein.

31. Provide the construction of the Village of Sauget's (then the Village of Monsanto's) sewer system, did Monsanto (and/or other industries in the Village) ever, whether intentionally or by accident, spill or discharge process wastewaters, sanitary discharges and/or liquid chemical wastes directly into Dead Creek? Describe these spills or discharges.

RESPONSE: Information as to the methods used at the Krummrich plant for handling process wastewater and sanitary discharges both prior to and after the plant's connection to the Village of Sauget sewer system in about 1933 are described in Exhibit 3.4 and documents as otherwise referenced/provided herein.

32. Identify and describe all discharges or spills to Dead Creek from the Krummrich facility before and after the Village of Monsanto's sewer system was constructed.

RESPONSE: Information as to discharges or spills to Dead Creek both prior to and after the plant's connection to the Village of Sauget sewer system in about 1933 are described in Exhibit 3.4 and documents as otherwise referenced/ provided herein.

33. Answer 29 - 32 above regarding the U.S. Chemical Warfare Service plant.

RESPONSE: Monsanto has not located any information as to the U.S. Chemical Warfare Plant other than referenced above in the Response to Request No. 8. See Exhibit 3.2.

34. Provide all documents and pleadings associated with the civil lawsuit filed by citizens of Cahokia against Monsanto sometime in the 1940's.

RESPONSE: Monsanto objects that this Information Request is overly vague and has no apparent relevance to the disposal or treatment of hazardous substances in the Sauget Area I Site. Furthermore, to the extent that such information or pleadings exists, they would be a matter of public record

available to the EPA. Subject to the foregoing objections, Monsanto was unable to locate any information relating to a civil lawsuit, as described.

35. How did Monsanto handle, treat, and dispose of bottom ash and fly ash wastes generated from its power plant(s) at the Queeny and Krummrich facilities? Does Monsanto have any knowledge that these materials were or could have been used for cover material at Sites G, H, I and/or L in Sauget Area I? If so, describe how these materials were used for this purpose.

RESPONSE: Monsanto managed materials generated from its power plants over the decades of operation in a number of ways, many of which are irrelevant to the Sauget Area I Site. Monsanto cannot speculate as to whether the material could have been used for cover materials at Sites G, H, I and/or L in the Sauget Area I Site. To the extent that Monsanto has information concerning use of such materials by Leo Sauget or entities related thereto, such information is provided in Exhibits 3.3 and 3.5.

36A. [NOTE: The EPA requests contain two different requests, both marked as "36". For purposes of clarity, they will be referred to as "36A" and "36B".] In the RCRA Section 103(c) "Notification of Hazardous Waste Site" form completed for

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the Queeny facility, dated May 18, 1981, Monsanto admits to having disposed of drums below the ground in a landfill along Falling Springs Road.

a. Where is the precise location(s) of the landfill(s) referenced in this Notification, e.g., "the Sauget (Monsanto), Illinois Landfill"?

b. Were any other landfills not referenced in the Notification used for the disposal of hazardous wastes generated or used at the Queeny plant? If so, describe.

c. Provide any and all information and/or documentation indicating which specific landfill or landfills were used to accept the drums referenced in the Notification.

d. Provide the names of all personnel who would possess any knowledge regarding which landfill or landfills were used to accept the drums referenced in the Notification.

e. How was the figure for the "Total Facility Waste Amount," calculated (or why was it not calculated)?

f. How was it known that the drums subject to the Notification form contained organics, inorganics, and

solvents? Provide all documents and information which relate to this reported information, as well as all information which describes in greater detail the types and characteristics of the wastes contained in these drums.

g. Provide all documents which pertain to or provide information regarding which landfill or landfills were used to accept the drums referenced in the Notification form, as well as the volume and types of hazardous wastes contained in the drums.

h. What is the basis for stating that the use of the landfill referenced in the Notification form stopped in 1957?

i. What is the basis for the Monsanto plant manager signing the Notification form as a "Transporter." Identify all other persons or companies which were involved in the transportation of the hazardous wastes identified in the Notification.

RESPONSE:

a. The precise location(s) of the landfill(s) referenced in this Notification are not known. It is believed that the company which provided the disposal service had its offices located on Falling Springs Road and

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hence that office address may have been utilized as the location.

b. The Notification described the information identified at that time as to disposal in the Sauget Area I Site. Any other information as to locations within the Sauget Area I Site are contained within the documents as provided/referenced herein.

c. See Exhibit 3.6 and the other documents provided/ referenced herein.

d. See Exhibit 3.6 and the other documents provided/ referenced herein.

e. See Exhibit 3.6 and the other documents provided/ referenced herein.

f. See Exhibit 3.6 and the other documents provided/ referenced herein.

g. See Exhibit 3.6 and the other documents provided/ referenced herein.

h. See Exhibit 3.6 and the other documents provided/ referenced herein.

i. While the basis for signing the form as "Transporter" is not clear, the form itself only offers limited choices. It is believed that "Transporter" was selected as best describing the role of the Krummrich plant. As for entities involved in transportation, see Exhibit 3.6 and the other documents provided/referenced herein.

36B. [The EPA requests contain two different requests, both marked as "36". For purposes of clarity, they will be referred to as "36A" and "36B".] Provide the same information as requested in 35a - i [sic], above with regard to the RCRA Section 103(c) Notification of Hazardous Waste Site form for the Krummrich facility dated May 15, 1981.

RESPONSE:

a. The precise location(s) of the landfill(s) referenced in this Notification are not known. It is believed that the company which was providing the disposal service had its offices located on Falling Springs Road and hence that office address may have been utilized as the location.

b. The Notification described the information identified at that time as to disposal in the Sauget Area I Site. Any other information as to locations within the Sauget

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Area I Site are contained within the documents as provided/referenced herein.

c. See Exhibit 3.6 and the other documents provided/ referenced herein.

d. See Exhibit 3.6 and the other documents provided/ referenced herein.

e. See Exhibit 3.6 and the other documents provided/ referenced herein.

f. See Exhibit 3.6 and the other documents provided/ referenced herein.

g. See Exhibit 3.6 and the other documents provided/ referenced herein.

h. See Exhibit 3.6 and the other documents provided/ referenced herein.

i. While the basis for signing the form as "Transporter" is not clear, the form itself only offers limited choices. It is believed that "Transporter" was selected as best describing the role of the Krummrich plant. As for entities involved in transportation, see Exhibit 3.6 and the other documents provided/referenced herein.

37. On May 15, 1981, Monsanto also filed a Section 103(c) Notification for the disposal at Krummrich facility wastes at the W.G. Krummrich Landfill on Route 3. Describe how the wastes reported on this Notification differ from the wastes reported on the Notification filed for the Krummrich wastes disposed of at the Falling Springs landfill, referenced above in Request 36?

RESPONSE: The Section 103(c) Notification for disposal at the W. G. Krummrich Landfill on Route 3 pertains to disposal on Monsanto-owned property in a location outside of the Sauget Area I Site. This location has been previously designated by IEPA as Site R in the Sauget Area II Site. Accordingly, the wastes in this notification were apparently sent to a different location than that which was referenced in Request No. 36B above. The time period for use of the locations also appears to be different.

38. Identify and describe all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Krummrich facility property. For each solid waste unit identified, provide the following information:

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a. A map showing the unit's boundaries and the location of all known solid waste units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

b. The type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;

c. The dates that the unit was in use;

d. The purpose and past usage (e.g., storage, spill containment, etc.);

e. The quantity and types of materials (hazardous substances and/or any other chemicals) located in each unit; and

f. The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit;

g. If the unit is no longer in use, when and how such unit was closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

h. A complete description of any and all releases, or spills or leaks of hazardous substances, or any

materials or liquids containing or contaminated with hazardous substances, from the unit.

RESPONSE: Monsanto objects that this Information Request does not seek information related to the disposal or treatment of hazardous substances in the Sauget Area I Site. To the extent that hazardous substances were disposed of on the Queeny or Krummrich property, these materials are the subject of separate proceedings pursuant to the Resource, Conservation and Recovery Act (RCRA). Information relating to such activities have been provided to appropriate state and EPA offices and is available for review at those offices.

39. Provide copies of all local (e.g., Village of Sauget or Monsanto) environmental permits or licenses ever granted for the Krummrich facility or any part thereof.

RESPONSE: To the extent that such information is presently available, see Exhibit 3.7.

40. For each disposal of PCBs, material containing PCBs, PCB Articles, PCB Equipment, and PCB Containers (as defined at 40 C.F.R. § 761.3) from the facility or on facility property and which contained PCBs at concentrations of 50 ppm or greater, provide the following information:

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a. Identify the type of materials containing PCBs, PCB Article, PCB Equipment, and/or PCB Container, as well as its contents. Give any serial numbers or identification numbers or codes;

b. Quantity of material containing PCBs and numbers of PCB Articles, PCB Equipment, and PCB Containers, as well as the quantity of their contents;

c. PCB concentrations;

d. Dates of disposal;

e. Name and location of the PCB disposal facility or PCB storage facility not part of the Queeny or Krummrich facilities;

f. Location and description of the PCB disposal or fill areas at the Queeny or Krummrich facilities.

RESPONSE: Monsanto objects that this information is not related to treatment or disposal of hazardous substances in the Sauget Area I Site. To the extent that this relates to disposal on facility property, information may have been provided to EPA and state authorities under RCRA and/or Toxic Substances Control Act (TSCA) and may be available for review at those offices.

41. Provide the following information for chlorobenzenes, chlorophenols, chloroanilines, nitrophenols, nitroanilines, and PCBs:

a. A description of how the substance is or was generated and/or used at the facilities;

b. An estimation of the quantity of the substance generated or used at the facilities;

c. A description of Monsanto's storage, treatment, and/or disposal policies or practices for each substance throughout the operating history of the Queeny and Krummrich facilities;

d. Any and all documents, reports, forms, permits or manifests indicating the substance's transportation to and/or disposal in Sauget Area I sites.

RESPONSE: Monsanto objects that the information requested is overbroad, irrelevant and without competent authority pursuant to Section 104(e) of CERCLA in that it seeks information which is not related to the treatment or disposal of hazardous substances in the Sauget Area I Site. Without waiving these objections, certain manufacturing information is included in Exhibit 3.2. Information, to the extent that it exists, on transportation and/or disposal in

the Sauget Area I Site may be contained in documents otherwise provided/ referenced herein.

42. For each spill or discharge or release of any hazardous material used or generated by the Krummrich facility, including chlorobenzenes, chlorophenols, chloroanilines, nitrophenols, nitroanilines and PCBs, provide the following information:

a. Source of spill, discharge or release;

b. Concentration of the source;

c. Location of spill, discharge or release;

d. Type of material onto which spill or discharge occurred;

e. Area over which spill or discharge occurred;

f. Date of the spill or discharge;

g. Summary of any test results from the area where spill or discharge occurred;

h. Diagram or map of spill or discharge area showing location of any sampling points;

i. Description of any cleanup activities and summary of any post cleanup verification sample results;

j. Disposition of any hazardous material from any cleanup;

k. All reports, memoranda, or analysis concerning the spill, discharge or release.

RESPONSE: Monsanto objects that the information requested is overbroad, irrelevant and without competent authority pursuant to Section 104(e) of CERCLA in that it seeks information which is not related to treatment or disposal of material in the Sauget Area I Site. To the extent that such information does relate to the Sauget Area I Site, this information is otherwise provided/referenced herein. Furthermore, if such information exists, it would be the subject of separate spill reporting/cleanup proceedings pursuant to CERCLA, EPCRA, RCRA and/or state equivalents. Information relating to such activities would therefore have been provided to appropriate EPA and/or state offices and may be available for review at those offices.

43. For each pit, pond, lagoon, settling tank, oil/water separator, water treatment unit or similar structure located at the facilities, provide the following information:

a. Location and description of these areas or structures;

b. Dates of any and all cleanings or removals of any material from these areas or structures. List most recent cleanings or removals first;

c. Reason for each cleaning or removal;

d. Description of method employed for each cleaning or removal;

e. Description of any hazardous material removed, including PCBs, and quantity of material removed;

f. Concentrations of hazardous materials removed, including PCBs, released or discharged on or off site from these areas or structures;

g. Disposition of material removed;

h. Any test data, including PCB test data, concerning these areas or structures not associated with a cleaning or removal;

i. Identification and description of any release or discharge on or off site from these areas or structures;

j. Dates when release or discharges occurred;

k. Type of material and concentrations of releases or discharges;

l. Description of any cleanup activities for releases or discharges;

m. Summary of any post-cleanup verification sampling and disposition of material from the cleanup.

RESPONSE: Monsanto objects that the information requested is overbroad, irrelevant and without competent authority pursuant to Section 104(e) of CERCLA in that it seeks information which is not related to treatment or disposal of material in the Sauget Area I Site. To the extent that such information does relate to the Sauget Area I Site, this information is otherwise provided/referenced herein. Furthermore, if such information exists, it would be the subject of separate spill reporting/cleanup proceedings pursuant to CERCLA, EPCRA, RCRA and/or state equivalents. Information relating to such activities would therefore have been provided to appropriate EPA and/or state offices and may be available for review at those offices.

44. Provide a copy of any annual documents required to be kept for the facilities in accordance with 40 C.F.R. § 761.180(a).

RESPONSE: Monsanto objects that the information requested is overbroad, irrelevant and without competent authority pursuant to Section 104(e) of CERCLA in that it seeks information which is not related to the treatment or disposal of hazardous substances in the Sauget Area I Site. However, without waiver of this objection, the documents for the Krummrich facility will be available for inspection upon reasonable request at the Krummrich facility. Please contact Stephen P. Krchma, Environmental Counsel, Monsanto Company, 800 N. Lindbergh Blvd., St. Louis, MO 63167, 314/694-1278. The Queeny facility has been "PCB free" since 1987 and, accordingly, is not required to maintain such documents.

45. Provide any information you have generated or gathered on groundwater flow and groundwater quality on or around the plants and/or on or around Sauget Area I other than that generated by the Monsanto groundwater study conducted in 1984.

RESPONSE: Monsanto objects that this Information Request is overbroad, irrelevant and without competent authority pursuant to Section 104(e) of CERCLA in that it seeks information which is not related to the treatment or disposal of material in the Sauget Area I Site. To the extent that hazardous materials were disposed of on the Queeny or Krummrich property, these are the subject of

separate proceedings pursuant to the Resource, Conservation and Recovery Act (RCRA). Information relating to such activities have been provided to appropriate state and EPA offices and is available for review at those offices. Information as to groundwater on or around the Sauget Area I Site itself is addressed in the Response to Request No. 47 below and in other documents provided/referenced herein.

46. Provide any information and documents you have generated or gathered (including documents obtained in discovery in lawsuit Cerro v. Monsanto Co., Docket No. 92-CV-204-WDS) about or in any way concerning the contamination found to exist in the Sauget Area I, including any information concerning the source of such contamination.

RESPONSE: This information is being provided as described in Monsanto's initial response on this matter dated August 24, 1994. See Exhibit 2.2.

47. Describe all measures taken by Monsanto or its consultants which have been taken to characterize, measure, sample or in any way test for the presence of hazardous materials at or around Sauget Area I. Provide the results of such testing.

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RESPONSE: See Exhibit 3.8. Portions of this information are also being provided as described in Monsanto's initial response on this matter dated August 24, 1994. See Exhibit 2.2.

48. Provide a history of the ownership of the Queeny facility.

RESPONSE: Monsanto objects that this information is overbroad, irrelevant and without competent authority pursuant to CERCLA Section 104(e). However, without waiving such objection, see Exhibit 3.2.

49. Provide copies of any sampling analytical reports which are responsive to any of these questions and clearly indicate on each analytical report copy, the question(s) to which it is responsive.

RESPONSE: See Exhibit 3.8. Portions of this information are also being provided as described in Monsanto's initial response on this matter dated August 24, 1994. See Exhibit 2.2.

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Stephen P. Krchma, being duly sworn, deposes and says that he has read the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area I, Sauget, Illinois" and is familiar with the contents thereof; that the deponent is without personal knowledge of the matters stated in the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area I, Sauget, Illinois"; that the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area I, Sauget, Illinois" has been assembled by authorized employees and counsel of Monsanto Company who have informed deponent that the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area I, Sauget, Illinois" is true; and that to the best of deponent's knowledge this "Monsanto's Response to Request for Information Concerning Sauget Area I, Sauget, Illinois" is true.

Stephen P. Krchma

Subscribed and sworn to before me
this the 17th day of October, 1994.

Harriet Conlon
Notary Public in and for said
County and State

HARRIET CONLON
Notary Public — Notary Seal
STATE OF MISSOURI
ST. LOUIS COUNTY
My Commission Expires: August 15, 1998

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