INSTRUCTIONS

NOTE

PURSUANT TO THE AUTHORITY OF SECTION 104(E) OF THE COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT (CERCLA), 42 U.S.C. 9604(E), AS AMENDED BY THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986, PUB. L. 99-499, YOU ARE HEREBY REQUESTED TO RESPOND TO THE INFORMATION REQUESTS ENCLOSED. COMPLIANCE WITH THE ENCLOSED INFORMATION REQUESTS IS MANDATORY. FAILURE TO RESPOND FULLY AND TRUTHFULLY TO EACH AND EVERY INFORMATION REQUEST WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS LETTER, OR TO ADEQUATELY JUSTIFY SUCH FAILURE TO RESPOND, CAN RESULT IN ENFORCEMENT ACTION BY U.S. EPA PURSUANT TO SECTION 104(E)(5) OF CERCLA WHICH, AS AMENDED, AUTHORIZES THE UNITED STATES TO SEEK PENALTIES FROM A FEDERAL COURT OF UP TO $25,000 FOR EACH DAY OF CONTINUED NON-COMPLIANCE. PLEASE BE FURTHER ADVISED THAT PROVISION OF FALSE, FICTITIOUS, OR FRAUDULENT STATEMENTS OR REPRESENTATIONS MAY SUBJECT YOU TO CRIMINAL PENALTIES OF UP TO TEN THOUSAND DOLLARS ($10,000) OR UP TO FIVE (5) YEARS OF IMPRISONMENT OR BOTH UNDER 18 U.S.C. 1001.

1. A separate response must be made to each of the questions set forth in this Information Request.

2. Precede each answer with the number of the Information Request to which it corresponds.

3. In answering each Information Request, identify all contributing sources of information.

4. If information is not known or is not available to the Respondent as of the date of submission of his/her response, should information later become known by or available to the Respondent, Respondent must supplement his/her response to U.S. EPA. Moreover, should the Respondent find, at any time after the submission of his/her response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify U.S. EPA thereof as soon as possible.

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5. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

6. You must respond to the Information Requests on the basis of all information and documents in your possession, custody or control or in the possession, custody or control of your former or current employees, agents, servants, contractors or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge, and regardless of source.

7. Your response should be accompanied by a notarized affidavit from a responsible company official or representative stating that a diligent record search has been completed and that there has been a diligent interviewing process with present and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal or other handling practices of the Respondent between, unless otherwise noted, 1930 and the present. To the extent that any information you provide relating to these Requests is based on your personal knowledge, or the personal knowledge of your employees, agents, or other representatives, this information shall be in the form of a notarized affidavit.

8. If any document responsive to a request was, but no longer, in the possession, custody, or control of Respondent, provide the following information:

   a. state the disposition of the document;

   b. state the date such disposition was made;

   c. identify the present custodian of the document, state his address or, if the document no longer exists, so state;

   d. identify the person who made the decision regarding the disposition of the document;

   e. state the reason for the disposition; and

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f. describe the document and the contents of the document, including the title, date, author, addressees, locations and number of copies made and the location of the copies;

g. state whether the document was disposed of pursuant to and in compliance with a company document management policy.

9. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36901 et seq. (September 1, 1976); 43 Federal Register 4000 et. seq. (September 8, 1978); 50 Federal Register 51654 et.seq. (December 18, 1985).] If no such claim accompanies the information when it is received by U.S. EPA, it may be made available to the public by U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA. In order to facilitate handling any confidential business or financial information, please provide such information on separate pages and group all such pages together in one portion of the response. Clearly identify the information as confidential by placing the word "confidential" in the upper right hand corner of the first page containing the information and on the cover letter transmitting it.

10. U.S. EPA has the authority to use the information requested herein in an administrative civil or criminal action.

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DEFINITIONS

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, partners, successors, assigns, subsidiaries and agents.

2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.

3. "The Site" shall mean and include the property designated on the attached map as "Area 1" located in Sauget and Cahokia, Illinois.

4. The facility shall mean the W.G. Krummrich Plant facility located in Sauget, Illinois and, unless excluded from the Information Request, the J.F. Queeny facility located at 1700 South Second Street in St. Louis, Missouri.

5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.

6. The term, "pollutant" or "contaminant", shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.

7. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.

8. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.

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9. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above, including PCBs, and shall include all by-product and off-specification wastes used or generated by the Respondent.

10. The term "non-hazardous material" shall mean all pollutants and contaminants, as defined above, excluding hazardous material.

11. The terms, "furnish", "describe", or "identify" or "indicate", shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.

12. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known business address and telephone number, present or last known home address and telephone number, and present or last known job title, position or business.

13. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.

14. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

15. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

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16. "Transaction" or "Transact" means every separate act, deal, instance, occurrence, sale, transfer, giving, delivery, change in ownership, or change in possession.

17. As used herein, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra-office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.

18. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these information requests any information which might otherwise be construed to be outside their scope.

19. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

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20. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Part 260-280, in which case the statutory or regulatory definitions shall apply.

MONSANTO CHEMICAL COMPANY
REQUESTS

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

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.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons and where they can be contacted.

4. List the EPA Identification Numbers of the Respondent.

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.

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.

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;

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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.

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.

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

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.

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.

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;

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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.

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.

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.

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.

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.

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?

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.

19. Does Monsanto disagree with the contention that at least a portion of the Sauget Area 1 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.

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 1 sites was used, or generated at its Queeny or Krummrich facility? If Monsanto so disagrees, provide all information and documentation which supports this position.

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 2 chemically matches the wastes found at site G in Area 1? If Monsanto so disagrees, provide all information and documentation which supports this position.

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?

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 services. In particular, describe the arrangement with this company regarding where these materials and/or fly ash were to be disposed of.

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.

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 Sauget Area 1 sites?

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

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.

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 Salvage Inc., or Sauget & Company. Provide all contracts or agreements associated with these services.

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?

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?

31. Prior to 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.

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.

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

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

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 1? If so, describe how these materials were used for this purpose.

36. In the RCRA Section 103(c) "Notification of Hazardous Waste Site" form completed for 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.

36. Provide the same information as requested in 35a - i, above with regard to the RCRA Section 103(c) Notification of Hazardous Waste Site form for the Krummrich facility dated May 15, 1981.

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?

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 storage6 areas, etc.) on the Krummrich facility property. For each solid waste unit identified, provide the following information:

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.

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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.

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:

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.

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 1 sites.

42. For each spill or discharge or release of any hazardous materials 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.

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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.

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).

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 1 other than that generated by the Monsanto groundwater study conducted in 1984.

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 1, including any information concerning the source of such contamination.

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 1. Provide the results of such testing.

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

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.