ETHYL CORPORATION

157407

INTER-OFFICE

June 20, 1979

TAB 16

TO: Mr. L. E. Blanchard, Jr.
Mr. B. C. Gottwald
Mr. F. D. Gottwald
Mr. F. D. Gottwald, Jr.
Mr. R. Herzog

FROM: D. E. Park

SUBJECT: Congressional Inquiry - Waste Disposal Site Survey

The Hon. Bob Eckhardt, Chairman of the House of Representatives Subcommittee on Oversights and Investigations, has requested information on waste disposal practices from the 50 largest domestic chemical companies. The purposes of the survey are to: (1) identify dump sites that may be hazardous, (2) determine whether additional legislation is needed to address the waste disposal problem, and (3) examine the performance of EPA in implementing the Resource Conservation and Recovery Act. Although supplying the requested information by filling out the questionnaire is not compulsory, it is likely that those companies refusing to answer will have the opportunity to send someone to answer the Subcommittee's questions in person under subpoena. To our knowledge, all of the companies that received the questionnaires plan to answer.

Information for the survey has been prepared for the chemical plants at Baton Rouge, Elgin, Houston, Magnolia, Orangeburg, and Sauget. The answers cover all chemical process wastes excluding wastes sold for recycle/reprocessing and all wastes covered by NPDES permits.

The completed survey forms are due in the Subcommittee's office in Washington before the end of office hours on June 29.

D. E. Park

D. E. Park

cc: With Complete Attachment
Mr. W. F. Armstrong
Mr. C. B. Crowell
Mr. E. W. Elmore
Dr. W. E. Foster
Mr. J. H. Huguet
Mr. R. A. Moser
Mr. R. D. Sinner
Mr. F. P. Warne

cc: With Plant Survey Form
Mr. D. J. Coon - Sauget
Dr. J. F. Hardwicke - Elgin
Mr. C. B. Hunt - Houston
Mr. H. J. Madden - Magnolia
Mr. W. C. Strader - Baton Rouge
Mr. T. S. Taylor - Orangeburg

cc: Letter Only
Mr. A. O. Wikman

(DO NOT USE) (1-5)

FORM A: GENERAL FACILITY INFORMATION

Company Name: Ethyl Corporation
Division/Subsidiary
Facility Name: Edwin Cooper, Inc.

Address: Monsanto Avenue
No. Street
Sauget Illinois 62201
City State Zip Code

Name of Person Completing Form: James Sparks

Position: Environmental Tech.

Phone Number: (618) 274-4000

1. Year Facility Opened ..... 19 [7|1] (10-11)

2. Primary SIC Code ..... [2|9|9|2] (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
USE ONLY TONS IF POSSIBLE - right justify response

thousand gallons ..... [ ] (16-24)

hundred tons ..... [1|2|4] (25-32)

thousand cubic yards ..... [ ] (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill ..... [9|8] (42-44)

in pit/pond/lagoon ..... [ ] (45-47)

in deep well ..... [ ] (48-50)

incinerated ..... [1] (51-53)

reprocessed/recycled ..... [1] (54-56)

evaporated ..... [ ] (57-59)

unknown ..... [ ] (60-62)

other (Specify _____) ..... [ ] (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? ..... [3] (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) ..... [1] (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) ..... [1] (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms ..... 19[7|8] (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms ..... 19[7|1] (73-74)

FINAL

(DO NOT USE) (1-8)

FORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Ethyl Corporation Division/Subsidiary _____
Facility Name: Edwin Cooper, Inc.
Name of Site: Sauget and Co. Landfill
Address of Site: Monsanto Avenue
no. street
Sauget Illinois 62201
city state zip code

Name of Owner (while used by facility): Paul Sauget
Address: 2700 Monsanto Avenue
no. street
Sauget Illinois 62201
city state zip code

Current Owner (if different from above): _____
Address: _____
no. street
_____
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed ..... 19__ (13-14)
4. Year first used for process waste from this facility 19 71 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 79 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... (19-26)
   Right justify response hundred tons 1122 (27-33)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	3	(42)
landfill, mixed industrial waste	1	(43)
landfill, drummed waste	9	(44)
landfill, municipal refuse co-disposed	9	(45)
pits/ponds/lagoons	3	(46)
deep well injection	3	(47)
land farming	3	(48)
incineration	3	(49)
treatment (eg. neutralizing)	3	(50)
reprocessing/recycling	3	(51)
other (specify) _____	3	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Monsanto Company
Monsanto Avenue
Sauget, Illinois 62201

FORM B CONTINUED ON SECOND PAGE

(DO NOT USE) (1-3)

Company Name: Ethyl Corporation
Division/Subsidiary
Facility Name: Edwin Cooper, Inc.

Site Name: Sauget and Co. Landfill

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	1	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_2, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

* Trace amounts only

FINAL

FORM B: DISPOSAL SITE INFORMATION

(DO NOT USE) (1-8)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Ethyl Corporation Division/Subsidiary

Facility Name: Edwin Cooper, Inc.

Name of Site: Rollins Environmental Services, Inc.

Address of Site: P. O. Box 609
no. street

Deer Park Texas 77536
city state zip code

Name of Owner (while used by facility): Rollins Environmental

Address: P. O. Box 609
no. street

Deer Park Texas 77536
city state zip code

Current Owner (if different from above):

Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 7 8 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 9 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... (19-26)
   Right justify response hundred tons ..... 0 0 0 0 0 0 0 0 (27-33) *
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
   landfill, mono industrial waste 3 (42)
   landfill, mixed industrial waste 3 (43)
   landfill, drummed waste 3 (44)
   landfill, municipal refuse co-disposed ... 3 (45)
   pits/ponds/lagoons 3 (46)
   deep well injection 3 (47)
   land farming 3 (48)
   incineration 1 (49)
   treatment (eg. neutralizing) 3 (50)
   reprocessing/recycling 3 (51)
   other (specify) 3 (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 9 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

* 8 Tons

FORM B CONTINUED ON SECOND PAGE

(DO NOT USE) (1-3)

Company Name: Ethyl Corporation
Division/Subsidiary
Facility Name: Edwin Cooper, Inc.

Site Name: Rollins Environmental Services

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)*
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	1	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P_2, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

* Trace

FORM B: DISPOSAL SITE INFORMATION

(DO NOT USE) (1-6)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: Ethyl Corporation Division/Subsidiary
Facility Name: Edwin Cooper, Inc.
Name of Site: Clayton Chemical Company
Address of Site:
no. street
Sauget Illinois 62201
city state zip code

Name of Owner (while used by facility): B. R. Haney
Address:
no. street
Sauget Illinois 62201
city state zip code

Current Owner (if different from above):
Address:
no. street
city state zip code

1. Location (1= the property on which facility is located; 2= off-site) 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
   IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 7 1 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 7 9 (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... (19-26)
   Right justify response hundred tons 7 (27-33)
   thousand cubic yards ..... (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	3	(42)
landfill, mixed industrial waste	3	(43)
landfill, drummed waste	3	(44)
landfill, municipal refuse co-disposed	3	(45)
pits/ponds/lagoons	3	(46)
deep well injection	3	(47)
land farming	3	(48)
incineration	9	(49)
treatment (eg. neutralizing)	3	(50)
reprocessing/recycling	1	(51)
other (specify)	3	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) 3 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

FORM B CONTINUED ON SECOND PAGE

(DO NOT USE)

Company Name: Ethyl Corporation
Division/Subsidiary
Facility Name: Edwin Cooper, Inc.
Site Name: Clayton Chemical Company

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH>12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >50pico curies/gram	2	(27)
uranium residuals & residuals for UF_6 recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	2	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	1	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	2	(58)
salts	2	(59)
mercaptans	2	(60)
Misc	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P4, aluminum chloride)	2	(67)
wastes with flash point below 100° F	2	(68)

* Trace

FORM E: HAULER INFORMATION

(DO NOT USE) (1-5)

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: Ethyl Corporation
Division/Subsidiary
Facility Name: Edwin Cooper, Inc.

Name of Firm or Contractor	Address	ICC # (If Known)	Years Used
Hueffmeier Bros.	11506 Bowling Green Dr. St. Louis, MO 63141		2
Empire Disposal	8923 Bunkum Road Fairview Hqts., ILL 62208		7
Bliss Waste Oil Co.	P. O. Box 37 Streeker Rd. Ellisville, MO 63011		9
Harold Waggoner & Co.	E. St. Louis, Ill 62206		1
ABF Freight System	8630 Hall St. St. Louis, MO		2