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Monsanto

Monsanto Chemical Company
1700 South Second Street
P.O. Box 7040
St. Louis, Missouri 63177-7040
Phone: (314) 622-1400

W STM

September 23, 1991

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RCOM SECTION

VIA CERTIFIED MAIL

Mr. Morris Kay
Regional Administrator
U.S. Environmental Protection Agency
Region 7
WSTM Division/RCRA Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Monsanto - J. F. Queeny Plant
EPA Id. No. MOD 004 954 111
Groundwater sampling

Dear Mr. Kay:

Enclosed please find a letter from Geraghty & Miller with results of the first round of groundwater sampling and a proposal for analytical parameters for the second round. We plan to collect the second round of samples the week of October 7, 1991, and would appreciate a response from the Agency no later than October 4, 1991.

If there are any questions or need for more information, please contact Mr. Robert L. Cheever, Environmental Protection Superintendent, at 314-622-1641

Sincerely,

Russell F. Sackett

Russell F. Sackett
Plant Manager

cc: Pat Nichols - EPA
R. L. Cheever
J. S. Hanson - F2WJ

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R00107816
RCRA RECORDS CENTER

GERAGHTY & MILLER, INC.
Environmental Services

Ground Water Engineering Hydrocarbon Remediation Education

September 17, 1991

Ms. Jo Hanson
Monsanto Chemical Company
800 North Lindbergh Blvd. F2WJ
St. Louis, MO 63167

Dear Ms. Hanson:

As requested, Geraghty & Miller, Inc. has reviewed the first round of ground-water data developed for the RCRA Facility Investigation (RFI) at Monsanto's JF Queeny plant in St. Louis, Missouri. This review was conducted to recommend a modified list of parameters for the second round of ground-water sampling. All monitoring wells sampled during the first round were analyzed for the full list of Appendix IX constituents. The only exception to this are the six wells at the former Lasso Production area (GM-1 through 5 and MW-14), where the samples were analyzed for the volatile organic fraction of the Appendix IX parameters as required by the work plan. The Appendix IX list consists of volatile organic compounds (VOCs), base neutral and acid extractable organic compounds, metals, cyanide, sulfide, pesticides, polychlorinated biphenyls (PCBs), herbicides, chlorinated dioxins, and furans. We have provided summary data tables of water quality for your review (Tables 1 through 4).

All of the wells sampled during the first round plus two new bedrock wells are scheduled to be sampled during round 2. Based on our review, we recommend that all monitoring wells scheduled to be sampled during round 2 be analyzed for VOCs. Selected wells will also be analyzed for base neutral organic compounds and total and dissolved metals. The sampling schedule is provided below:

125 East Bethpage Road • Plainview, New York 11803 • (516) 249-7600 • FAX (516) 249-7610

Well ID	Volatile Organic Compounds	Base Neutral Organic Compounds	Total and Dissolved Metals
GM-1	X		
GM-2	X		
GM-3	X		
GM-4	X		
GM-5	X		
MW-2A	X		
MW-2B	X		
MW-2R	X		X
MW-3(D)	X		X
MW-4	X	X	X
MW-8A	X	X	X
MW-8B	X	X	X
MW-8R	X	X	X
MW-9	X		
MW-10	X	X	X
MW-11A	X		X
MW-11B	X		X
MW-13	X	X	X
MW-13R	X	X	X
MW-14	X		
MW-15	X		X
MW-20	X		X
QS-1	X	X	X
TW-1	X	X	X
OBS-1	X	X	X
VW-2	X	X	X
VW-2B	X		X
HW-1B	X		X

Based on our review, it is apparent that VOCs are the primary constituents detected in ground water. As such, we recommend that all monitoring wells scheduled to be sampled during round 2 be analyzed for VOCs. The Lasso Production area wells (GM-1 through GM-5, and MW-14) will again only be sampled for VOCs.

Base neutral compounds were detected in several wells, and we recommend that ground-water samples from these wells will be analyzed for base neutral compounds again during round 2 as a means of confirming first round data. The only acid extractable organic compound detected in ground-water samples is 2-chlorophenol in wells MW-8A and VW-2 (at 25 and 16 micrograms per liter, respectively). Because this is interpreted as an isolated occurrence of relatively low concentrations, we recommend that acid-extractable organic compounds be omitted from the modified list of analytical parameters.

Total and dissolved metals were detected above the US Environmental Protection Agency (USEPA) and/or Missouri Department of Natural Resources (MDNR) maximum contaminant level (MCL) in some monitoring wells. For each well where the concentration of at least one metal exceeded either agency standard, the well will be resampled for analysis of total and dissolved metals.

Pesticides, PCBs, herbicides, and chlorinated dioxins were not detected in any first round ground-water sample. Therefore, we recommend that these constituents not be analyzed during the second round.

Bedrock wells MW-8R and MW-13R were completed with stainless steel screens and riser pipe in August 1991 and have not yet been sampled. We recommend these two wells be sampled for VOCs, total and dissolved metals, and base neutral organic compounds based on the results of wells MW-8A/MW-8B, and MW-13 which are screened in the unconsolidated formation above the bedrock wells. Because wells MW-8R and MW-13R are very low-yielding (recovery rates are less than 0.5 gallons per hour), they will be

evacuated at the beginning of the sampling day and allowed to recover until there is a sufficient volume of water in the well before collecting the samples.

Please call if you have any questions.

Sincerely,

GERAGHTY & MILLER, INC.

Laurie B. Musiker
Senior Scientist
(516) 391-5261

Dennis Colton
Project Director
(516) 391-5236

LBM/DC:ml
Attachments
Hanson.ltr