Site: SANGAMO
Break: 11.10 v.4
Other: CONF

Sangamo
Pickens, S.C.

Permit:		avg.	max
001	interim	—	—
	final	—	—
002	interim	—	—
	final	nondetectable	nondetectable
003	interim	"	"
	final	"	"

Original application: 001 chlorinated hydrocarbons — absent

Revised application 4/22/74
001 - wastewater treatment plant outfall
002 - Cooling water outfall
003 - North cooling water outfall
004-006 - Septic tanks.
001-002-003 - "Oils containing PCB's are used in the manufacturing plant and could possibly be present in the discharge. No data available as to concentrations - will be available at a later date."

5/9/74 - Handwritten - draft - special conditions -
001-002-003 - PCB - nondetectable.

5/13/74 - Meeting with Sangamo - Note in file -
"BCB's - when toxic conditions come out, they will have to comply; can't tell what numbers will be."

10726788

7/18/74 - Letter to Sangamo - Public Notice & Fact Sheet
PCB's not tested for 001, 002 or 003.

9/19/74 - <u>Permit issued:</u>

DMR's - Co correctly report limits for PCB's.

8/6/75 - Combining to one discharge (001) - Request modification - suggested limits - summing the values of 001, 2 + 3 - PCB's not mentioned.

8/22/75 - Letter - EPA to Sangamo - Combine to values to determine new limits - PCB's not mentioned.

Each DMR after August 1975 - Co reported limit for PCB for 001 as --.
EPA did not correct until May 76.

2/18/76 - NOV sent to Sangamo - mentioned violations of pH, TSS + aluminum - not PCB's.

3/16/76 - Letter from SC to EPA - Appears to be misunderstanding on PCB's.

5/5/76 - letter from EPA to Sangamo - concerns PCB's give report on PCB's.
Letter mentions - "When the discharge limitations for each parameter are combined, the PCB non-detectable limit remained applicable."

6/15/76 - Meeting held with Sangamo on PCB's

8/13/76 - EPA + SC issue advisory on eating fish caught in Lake Hartwell.

8/23/76 - Show Cause letter sent - cites violation of PCB's.

8/26/76 - Show Cause meeting held

8/30/76 - Issue AO - violation of nondetectable limit on PCB.

9/22/76 - At Show Cause meeting & now Sangamo ~~without~~ raises arguments against legality of Order - PCB limit is not nondetectable.

Sangamo files suit against EPA.

10/13/76 - Meeting with Sangamo - Agreement reached on new limits for PCB's - Ex. 25.

Issue:

What does -- + nondetectable + nondetectable add up to: -- or nondetectable.

Sangamo: no limit - just monitor

EPA: limit nondetectable

Arguments:

If EPA intended to limit PCB's - nondetectable would be on 001 or on final limits on 001 - 002 & 003 - Not the way permit is written.