



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

MONSANTO COMPANY,  
Petitioner, )  
vs. )  
ILLINOIS ENVIRONMENTAL PROTECTION ) PCB 85-19  
AGENCY AND JOHN E. NORTON & ASSOC., )  
Respondents )

NOTICE

TO:

Dorothy Gunn, Clerk  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph Street  
Suite 11-500  
Chicago, Illinois 60601

James A. Geocaris  
Gabrielle Sigel  
Jenner & Block  
One IBM Plaza  
Chicago, Illinois 60611

John E. Norton & Assoc.  
105 West Washington Street  
P.O. Box 565  
Belleville, Illinois 62222

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the Response to Amended Petition

of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

ENVIRONMENTAL PROTECTION AGENCY  
OF THE STATE OF ILLINOIS

BY:

*William D. Ingersoll*

William D. Ingersoll  
Attorney  
Enforcement Programs

DATE: March 29, 1985  
Agency File #: 7447

2200 Churchill Road  
Springfield, Illinois 62706  
217/782-5544

6. The Agency denies any implication that this permit application was withdrawn prior to final Agency action in issuing the permit. Specifically, the information provided in this application was incorporated by reference into Permit No. 84010045 (See Exhibit 8). The Agency admits the rest of the allegations of paragraph 6.

7. The Agency admits the allegations of the first and third sentences of paragraph 7. The Agency specifically denies that the information given by Monsanto in Part 10 of Application No. 84010045 is "much more than the identity and quantity of wastes required by Section 7(d)."

8. The Agency denies the allegations of the first sentence of paragraph 8 in that the use of the qualifier "only" creates an improper characterization of Section 7(d). The Agency further denies the allegations of the rest of paragraph 8 and objects to the use of the word "waste" in place of "substance" as is actually used in Section 7(d).

9. The Agency denies the allegations of the second sentence in that the Board considered only the interpretation of Section 7(d)'s language, "to be placed in PCB 84-26. The Agency admits to the rest of paragraph 9.

10. The Agency denies the allegations of paragraph 10.

11. The Agency denies the allegations of the first and second sentences. The Agency has no actual knowledge of the allegations of the third sentence and neither admits nor denies them.

12. The Agency admits to paragraph 12.

13. The Agency denies that the procedural requirements were met entirely but admits that the procedural requirements were substantially met. Since the information at issue was determined to be disclosable under Section 7(d), the Agency made no substantive evaluation of the information as to its trade secret nature. Therefore, the Agency neither admits nor denies that Monsanto met the requirements for justifying the data as trade secrets.

14. The Agency admits the allegations of the first sentence of paragraph 14. The Agency has no actual knowledge of the allegations made in the second sentence and neither admits nor denies them. The Agency admits that the Act protects trade secrets but denies that the protection is unconditional.

15. The Agency denies the allegations of paragraph 15 in that the Agency disagrees with Monsanto's interpretation of "quantity and identity of substances" as stated in Section 7(d) and that any disclosure required in Section 7(d) could or should not violate Monsanto's trade secret rights.

16. The Agency agrees that the information contained in the Annual Hazardous Waste Reports is disclosable under Section 7(d). However, the Agency denies that "identity and quantity" as used in Section 7(d) is in any way limited by the form in which information is reported on the Annual Hazardous Waste Reports.

17. The Agency admits the allegations of paragraph 17.

18. The Agency neither admits nor denies the allegations of paragraph 18. The Agency further responds with the following AFFIRMATIVE ALLEGATIONS:

19. The Agency granted Monsanto a construction permit, pursuant to Application No. 18001004, on October 23, 1980. (See Exhibit 1). Monsanto requested and received from the Agency a one year extension of said construction permit. (See Exhibits 2 and 3). Monsanto subsequently withdrew the permit more than two years after its original issuance. (See Exhibits 4 and 5).

20. Submitted as part of Application No. 18001004 was a six-page chart entitled "Monsanto Company Incinerable Waste Characterization Active Liquids." This table describes substances "to be placed" in a hazardous waste treatment facility, the proposed incinerator. This detailed information was necessary for Agency consideration of the permit application and, in the very strong language of Section 7(d) "may under no circumstances be kept confidential."

21. The information described in paragraph 20 is part of the "files, records, and data of the Agency" as used in Section 7(a) of the Act. Decisions by Monsanto, subsequent to submission of the data and Agency action thereon, do not alter the character of that information contained in Agency files.

22. The Agency granted a construction permit to Monsanto, pursuant to Application No. 84060008, on August 30, 1984. (See Exhibit 6).

23. The information contained in Item 10 of page 35 of Application No. 84060008 (See Exhibit 16 of the Agency Record on file herein) is part of the "files, records, and data of the Agency" as used in Section 7(a). This information was necessary for Agency consideration of the permit application. Decisions by Monsanto, subsequent to submission of the data and Agency action thereon, do not alter the character of that information contained in Agency files.

24. The Agency granted Monsanto an operating permit, pursuant to Application No. 84010045, on March 13, 1984. (See Exhibit 7). The Agency subsequently issued a modified operating permit which incorporates the contents of Application No. 84060008. (See Exhibit 8, pg. 2). Therefore, the contents of Application No. 84060008 are still relevant to Monsanto's operating conditions.

25. The information contained in Item 10 of page 225 of Application No. 84010045 (See Exhibit 17 of the Agency Record on file herein) is part of the "files, records, and data of the Agency" as used in Section 7(a). This information was necessary for Agency consideration of the permit application.

26. The Agency has different informational requirements for different purposes. Information required in permit applications is more detailed, than that reported on forms such as the Annual Hazardous Waste Report

27. The information necessary for permit application consideration here includes identifying certain wastes by "waste composition." That is form in which substances are identified in Agency files and, consequently, that is the form in which the identity of those substances is disclosable under Section 7(d).

28. Monsanto's implication that the waste name identification is adequate for all purposes (see Amended Petition para. 17) is incorrect. The waste composition (in the same detail as is at issue here) is required on the "Special Waste Stream Application" required from waste haulers and operators of disposal sites. The contents of these applications are disclosable under Section 7(d). Many of said applications in Agency files concern wastes from Monsanto's W.G. Krummrich Plant, including some of those which are the subject of this appeal.

29. As to whether the chemical components of the wastes in question fall within the scope of Section 7(d), the Agency asserts that the key words are "identity" and "substance." Webster defines "identity" as "the condition of being the same with something described, claimed or asserted or of possessing a character claimed (establish the identity of stolen goods)." (Webster's Third New International Dictionary, unabridged, 1981). The "something described" in the instant case is the contested information, viz., the chemical composition of the wastes in item 10 of Exhibits 16 and 17 of the Agency record, and the six pages of information entitled "Incinerable Waste

Characterization" included in Permit Application No. 18001004, Exhibit 21 of the Agency record.

30. Webster defines "substance" as "matter of definite or known chemical composition; an identifiable chemical element, compound, or mixture - sometimes restricted to compounds and elements." The Agency has applied this definition to all information in its records. Since the permit application included the compounds and elements making up the various wastes which Monsanto proposed to incinerate, the Agency interprets "substance" to apply to all such information. The Agency asserts that characterizing a substance in one way, e.g., a "waste name," does not exhaust the legislative intent of identifying substances for purposes of Section 7(d).

31. The General Assembly anticipated that information which is required to be disclosed pursuant to Section 7(d) might otherwise be trade secret or confidential. The Section begins with "Notwithstanding subsection (a) above, . . ." which evidences an intent that the public's right to know takes priority over the property interests of owners of certain information in the Agency's files.

Respectfully submitted,  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: William D. Ingersoll  
One of it's Attorneys

William D. Ingersoll  
Mary V. Rehman  
2200 Churchill Road  
Springfield, Illinois 62706  
217/782-5544

WDI:dks/649e, 3-6

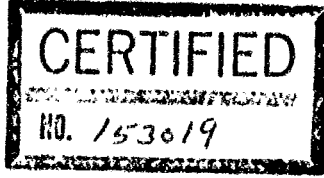


# Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-2115

Application No.: 18001004  
I.D. No.: 153121AW  
Received: January 18, 1980  
Construction of: Industrial Waste Incinerator  
Location: Route 3, Sauget, Illinois



October 23, 1980

Honsanto Company  
Wm. G. Krutzrich Plant  
Route 3  
Sauget, Illinois 62207

Attention: Mr. J. W. Holloy

Gentlemen:

Permit is hereby granted to construct the above-referenced equipment. This permit is granted according to the following findings and subject to the following conditions:

### Findings

1. Honsanto plans to construct an industrial waste incinerator at its Sauget, Illinois plant. The equipment to be constructed includes a waste charging building, waste storage tanks, the incinerator, three stage scrubber, electrostatic precipitator, and heat recovery boiler.
2. Sauget is located in Centreville Township in St. Clair County. The area is currently designated attainment for sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>x</sub>), and carbon monoxide (CO), and nonattainment for particulate matter (TSP) and ozone.

The County has a Class II designation for Prevention of Significant Deterioration (PSD) permit review.

3. The proposed project will increase particulate emissions from the Honsanto plant by 30 tons/year, SO<sub>2</sub> emissions by 60 tons/year, HC emissions by 13 tons/year, NO<sub>x</sub> emissions by 1000 tons/year and CO emissions by 55 tons/year. The proposed incineration facility is subject to PSD review as a major source of NO<sub>x</sub> emissions, emitting more than 250 tons per year of this contaminant.

The proposed construction is not subject to the Nonattainment Area Rules (Rules for Issuance of Permits to New or Modified Air Pollution Sources Affecting Nonattainment Areas) for particulate or organic material emissions since emissions of these contaminants are less than 50 tons/year.

Exhibit 1



6. Monsanto submitted a construction permit application to IEPA on January 10, 1980, and a PSD application to USEPA on the same date. On May 1, 1980, USEPA notified Monsanto that the application was considered to be incomplete. On June 10, 1980, Monsanto submitted additional information in support of the application. Based upon the information submitted on June 10, 1980, the IEPA found the application to be complete. On August 12, 1980, IEPA conveyed to USEPA requesting the transfer of the PSD application to IEPA for processing under the delegation of authority agreement. Monsanto requested transfer on August 15 and accordingly on August 29, USEPA formally transferred the PSD application to IEPA for processing.

6. After reviewing all material submitted by Monsanto, IEPA has determined that the project will be: 1) in compliance with all applicable IEPA regulations, and 2) will utilize Best Available Control Technology (BACT) on emissions of  $\text{NO}_x$ .

7. The improper incineration of hazardous wastes may pose a threat to the health of the public in the area and the general environment. The Agency has conducted a review of this incinerator for health impacts, and has determined that if properly operated it can dispose of wastes without harm to the public. Comprehensive regulations governing the incineration of hazardous waste have been proposed by USEPA, and are targeted for promulgation by November, 1980. These regulations set forth strict standards to ensure that hazardous wastes are incinerated with adequate temperature, excess oxygen and residence time to insure virtually complete destruction, that the incinerator is equipped with continuous monitoring devices to measure process variables and that stack gases are adequately cleaned prior to being exhausted.

In addition, strict regulations governing the incineration of PCB's and PCB contaminated material have been promulgated by USEPA. The requirements of these rules are being applied to this project through conditions placed on this approval.

7. The air quality analysis submitted by Monsanto and reviewed by IEPA shows that the proposed project will not cause violations of the annual ambient air quality standard for  $\text{NO}_x$ . There is presently no PSD increment applicable to  $\text{NO}_x$ .

8. The IEPA has found the project will comply with all applicable Illinois Air Pollution Control regulations and the Federal Prevention of Significant Deterioration regulations (PSD) of 40 CFR 51.21. The IEPA is prepared to issue approval to Monsanto to construct the proposed project subject to the following conditions and consistent with the specifications and data included in the application. Any departures from the conditions of this approval or terms expressed in the application would need to receive prior written authorization of IEPA.

9. any approval to construct would not relieve Monsanto of the responsibility to comply with all local, state and federal regulations which are part of the Illinois State Implementation Plan, as well as other applicable federal, state and local requirements.
10. A copy of this preliminary finding has been forwarded to the Sangre Town Hall, Sangre, Illinois and the public has been given notice and the opportunity to examine Monsanto's application, to submit comments, and to participate in a public hearing on this matter.

#### Conditions for Approval

1. Standard conditions attached hereto and incorporated herein by reference.
2. The permittee shall make available for review all final detailed drawings and specifications related to the equipment described in the above-referenced application, and shall submit copies of specific drawings and specifications of such equipment for IEPA approval prior to initiation of construction.
3. The permittee shall comply with all applicable requirements regarding the handling and disposal of polychlorinated biphenyls (PCBs), as set forth in 49 CFR, parts 761 and 769.
4. Particulate emissions shall be limited to 30 tons per year.
5. all emissions from the emergency vent shall be captured and returned to the incinerator at a later time in order to complete combustion. The agency will consider deletion of this condition provided that all feasible measures will be taken to minimize vent release including but not limited to:
  - a. redundancy to be designed into critical system components such as fan drives and power supply,
  - b. adequate quality control measures are applied to blending or waste streams to ensure uniformity of feed characteristics,
  - c. adequate flow rate controls are installed to prevent excess feed to the incinerator.
6. The following parameters must be monitored and recorded on a continuous basis:
  - a. combustion temperature at the kiln outlet and inside of the waste heat boiler.
  - b. carbon monoxide in the stack

- c. oxygen in the stack
- d. HC in the stack gas by flame ionization detector
- e. waste feed rate
- f. carbon dioxide in the stack

7. The incinerator and associated equipment must be inspected daily for leaks, spills and fugitive emissions.
8. All waste streams containing chlorophenols (identified in the application as streams C-7, C-5 and D-13) shall be incinerated under the following conditions:
  - a. minimum combustion temp of 1200°C and 2 seconds retention time
  - b. 5% excess oxygen
9. An operating permit will be issued to incinerate only those waste streams for which the incinerator's ability to adequately destruct has been successfully demonstrated by a trial burn. The operating permit will be revised to allow for incineration of additional waste streams upon receipt of results of successful trial burns.

10. The permittee must submit a proposed trial burn plan for agency approval at least 60 days prior to burning a hazardous waste stream for initial trial burns as well as subsequent trial burns or new hazardous waste streams, or for a waste stream which has changed composition significantly.

The trial burn plan should characterize the wastes to be incinerated and specify the parameters to be monitored, the monitoring techniques to be employed, and the duration of the tests.

11. Trial burns performed while burning wastes containing any of the substances listed below shall include a stack analysis for the presence of polychlorinated dibenzofurans (PCDF's) and polychlorinated dibenzodioxins (PCDD's):

- a. chlorophenols
- b. PCB's
- c. hexachlorophene
- d. polychlorinated benzene
- e. diphenyl ethers
- f. phenoxy acids

12. Within 60 days following completion of a trial burn the results shall be reported to the Agency.

- c. The number of full-time employees involved in source sampling, including brief comments on background, education and registrations.
- d. The number of part-time employees, if any, involved in source sampling, including brief comments on background, education and registrations.
- e. The number of years your company has performed source sampling tests.
- f. The type of pollutants you consider your company qualified to sample.
- g. The type of sampling trains you have and use, including manufacturer's name and a schematic diagram.
- h. A brief description of your laboratory facilities and qualifications of lab personnel.
- i. A sample copy of a final report, showing field data sheets, calculations, final report results, etc.
- j. Details of the methods and procedures which will be used to avoid a conflict of interest in self-performed tests.

Consistent tests to be conducted, using methods which vary from the Agency methods and procedures on file with the Secretary of State, must be reviewed and approved by the Agency prior to conducting such tests. Requests for Agency approval must include a proposed test plan detailing specific test methods and procedures at variance with Agency approved methods and comments on why standard procedures cannot be employed.

10. The permittee shall maintain a daily log of the incinerator operation. This log shall include but not be limited to the following information:

- a. Total daily amount of material burned from each of the 14 different waste streams in lb/hr. of each,
- b. Heat content of materials burned during each day of operation expressed in Btu per pound of material,
- c. Firing rate of any auxiliary fuels used expressed in lb. of lbs. fuel per hour,
- d. Flow rates of scrubant to each stage,
- e. Pressure drop across each stage of the scrubber,
- f. Suspended solids, total dissolved solids, pd and heavy metals content of inlet and outlet scrubant, to be recorded once per day,

3. Chemical composition of scrubber blowdown including but not limited to chloride, residual chlorine, sulfate, total sulfide, calcium, amines, organochlorine, pesticides and herbicides, and mercaptans. This analysis is to be performed once daily.
4. ESP operating parameters including primary and secondary current and voltage.
5. The above parameters are to be recorded hourly unless otherwise indicated.

The Agency will, upon request, reconsider the appropriateness of the above-required frequencies of measurement after a suitable amount of operating data has been gathered to warrant such reconsideration.

6. In conjunction with this permit, approval is given with respect to the Prevention of Significant Deterioration of Air Quality Regulations (PSD) to construct the above-referenced equipment, in that the Agency finds that the equipment fulfills all applicable requirements of 40 CFR 52.21.

This approval is issued pursuant to the Clean Air Act, as amended, 42 U.S.C. 7401 et. seq., the Federal regulations promulgated thereunder in 40 CFR 52.21 for PSD, and a delegation of authority agreement between the USEPA and the Agency for the administration of the PSD program. This approval is subject also to the preceding conditions.

If you have any questions concerning this permit, please contact Pat Dennis at 217/782-2113.

Very truly yours,

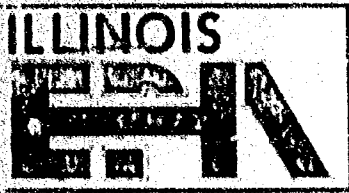
Sherrill Martin, P.E.  
Chief, Permit Section  
Division of Air Pollution Control

at:PDB:ca/sh/sp/1202h/1-7

PDA

RJ

- e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
    - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
    - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
    - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
    - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
    - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
  6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.
  7. These standard conditions shall prevail unless modified by special conditions.
  8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
    - a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or
    - b. upon finding that any standard or special conditions have been violated; or
    - c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.



# Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

*file*

217/782-2113

Permit #18001004  
I.D. #163121AAC

December 10, 1981

Monsanto Company  
Wm. G. Krumarich Plant  
Route 3  
Sauget, Illinois 62207

Attention: Mr. Jack W. Molloy  
Plant Manager

Gentlemen:

This is in response to your letter dated November 16, 1981 to Mr. Daniel Goodwin requesting an extension of above-referenced PSD permit for an incinerator.

Pursuant to 40 CFR 52.21, Regulation for Prevention of Significant Deterioration of Air Quality (PSD), the above-referenced PSD permit is extended for one year.

If you have any questions regarding this letter, please call Harish Desai at 217/782-2113.

Very truly yours,

Richard L. Jennings, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

RLJ:HBD:bjm/3017C/3

cc: Dan Goodwin  
Walter Franke

*11-81  
Trent  
Louise Arne*

Exhibit 3

CC - MAZ  
Permit Sect.

# Monsanto

10 163121AAC  
11 18001004

MONSANTO CHEMICAL INTERMEDIATES CO.  
Sauget, Illinois 62201  
Phone: (818) 271-5835

November 22, 1982

RECEIVED

NOV 22 1982

IEPA - DAPD - SPRINGFIELD

217/782-2113

Permit #18001004  
I.D. #163121AAC

Mr. Dan Goodwin, Manager Air Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

Dear Mr. Goodwin:

*continuation of*

Recently we discussed the PSD permit for building a Monsanto incinerator at the Wm. G. Krummrich Plant in Sauget, Illinois.

In our final evaluation, a significant number of things had changed which have caused us to arrive at the decision to not build the incinerator at this time. I am sure you appreciate the considerable technological questions which arose concerning how this incinerator would need to be built. In addition to that, the current economic conditions and availability of outside incineration capability have caused us to go other routes than build our own facility. At this point in time, we do not plan to build an incinerator at the Wm. G. Krummrich Plant.

Please accept my thanks for the considerable effort you and your people put forth in the initial granting of this permit, as well as the extension for an additional year. There is no question we at the plant wanted it very badly. Long haul, I do believe we will see some form of incineration built. At this time, it will be inappropriate for us to maintain these air permits which might limit someone else in the area.

Thanks again for the significant help you gave on this particular item.

Sincerely yours,

*Jack W. Molloy*  
Jack W. Molloy  
Plant Manager

JWM/ap

cc: Walter Franke,  
Supervisor Region III

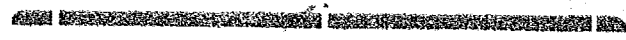


Exhibit 4





Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-2113

November 29, 1982

Monsanto Chemical Intermediates Co.  
Sauget, Illinois 62201

Attention: Jack W. Polloy, Plant Manager

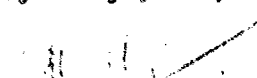
Application No.: 18001004  
I.D. No.: 163121AAC  
Construction of: Incinerator  
Letter Dated: November 22, 1982

Gentlemen:

The Agency hereby acknowledges the receipt of your above-referenced letter and confirms the withdrawal of your construction permit in accordance with your request.

Thank you for formally notifying us that this project has been cancelled. It allows us to remove it from our pending project files. We look forward to working with you on an incineration project down the road.

Very truly yours,

  
Bharat Mathur, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DN:CPN:sd/5817c/13

cc: Region III  
CPR 11-30-82  
CJH/11/82

*B.E.  
12-2-82  
District 7  
E. St. Louis APC*

Exhibit

5



217/762-2113

CONSTRUCTION PERMIT

PERMITTEE

Monsanto Company  
Route 3  
Sauget, Illinois

Attention: J.W. Holloy

Application No.: 04060008  
Applicant's Designation:  
Subject: SANTOFLEX MANUFACTURE  
Date Issued: August 30, 1984  
Location: Route 3, Sauget, Illinois

I.D. No.: 163121AAC  
Date Received: June 4, 1984

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of Santoflex Modification as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit is issued based upon a determination that the changes in emissions of existing equipment described in the application are not subject to 35 Ill. Adm. Code 203. This is because the existing manufacturing equipment is physically capable of producing 4 ADPA and is not otherwise limited by permit conditions, so that any increases in emissions do not constitute a modification, pursuant to Section 203.207(e).
2. Emissions of organic material from 10,000 gallon xylene storage tank shall not exceed one tons/year. This limit is based on annual emissions of organic material indicated in the application.

*B. Mathur, P.E.*  
Bharat Mathur, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DI:JDC:ba/1745d/26 *h*  
*RE*  
cc: Region 3

AGENCY'S FILE



217/782-2112

OPERATING PERMIT

F

PERMITTEE

Consarto Company  
H.G. Krummrich Plant  
Route 3  
Sauget, Illinois 62201

Attention: J. M. Molloy

Application No.: 04010045  
Applicant's Designation: 247PORCESS  
Subject: Santoflex Manufacturing  
Date Issued: March 13, 1984  
Location: Route 3, Sauget, Illinois

I.D. No.: 163121AAC  
Date Received: January 20, 1984  
Expiration Date: June 30, 1987

Permit is hereby granted to the above designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five autoclaves with associated feed tanks, blow tanks, filters, catalyst receivers, surge tanks, receivers and two distillation units for santoflex manufacture, and an autoclave with associated dehydrator, filtration unit, and a still for parphenetidine and dodecylaniline manufacture as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The emissions of organic materials from the autoclaves shall not exceed 8 lbs/hour limit of Rule 205(f).
2. The issuance of this permit does not relieve the Permittee of the responsibility of complying with the Illinois Environmental Protection Act and any regulations or standards adopted by the Pollution Control Board under the Act.

*B. Mathur*

Bharat Mathur, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

BT:VVG/maw/0496d/53

cc: Region 3 *3/16/84*

*VVG  
3/15/84*

Exhibit 7



217/782-2113

OPERATING PERMIT

I  
=

PERMITTEE

Monsanto Company  
W.G. Krummich Plant  
Route 3  
Sauget, Illinois 62201

Attention: J.W. Holloy

Application No.: 84010045  
Applicant's Designation: 247PROCESS  
Subject: SANTOFLEX MANUFACTURING  
Date Issued: August 30, 1984  
Location: Route 3, Sauget, Illinois

I.D. No.: 163121AAC  
Date Received: June 4, 1984  
Expiration Date: June 30, 1987

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five autoclaves with associated feed tanks, blow tanks, filters, catalyst receivers, surge tanks, receivers and two distillation units for santoflex manufacture, and an autoclave with associated dehydrator, filtration unit, and a still for parphenetidine and dodecycalanaline manufacture as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. The emissions of organic materials from the autoclaves shall not exceed 8 lbs/hour limit of Section 215.303 (formerly Rule 205(f)).
2. Emissions of organic material shall not exceed 16.4 tons/year. This limit is based on annual emissions of organic material indicated in the application.
3. The issuance of this permit does not relieve the Permittee of the responsibility of complying with the Illinois Environmental Protection Act and any regulations or standards adopted by the Pollution Control Board under the Act.

Exhibit 8



Page 2

It should be noted that this permit has incorporated the additions and modifications described in the construction permit application 3405000J.

*B. M. Mathur*

Bharat Mathur, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Uff:JDC:ba/1745d/36-37


cc: Region J *hcc*

VERIFICATION

I, William D. Ingersoll, an attorney for the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, ("Agency"), on oath state that I have read the attached Response to Amended Petition, and that based upon investigation and review of Agency files, the factual statements are true and correct.

  
William D. Ingersoll

SUBSCRIBED AND SWORN  
to before me on this  
29th day of March, 1985

  
Notary Public