

cc: CCC, BISHOP

Mr. J. J. Fritsch, Jr.
Mr. W. E. Meyer
Mr. W. Prajean
Mr. G. E. "Gry" Wallace

CCC, DALLAS

Mr. R. H. Maurer
CCC, NYO

Mr. G. A. Rodenhausen

 **CELANESE**
CHEMICAL COMPANY, INC.

CCC UNITERM COPY



W. H. BROUGH
WEB-747 B.1

July 17, 1982

CHEMCEL PLANT

Mr. Jay Snow, Supervisor
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

TITLE

Re: TDWR Registration No. 30084

NO ABSTRACT

The Bishop Plant presently disposes of friable asbestos insulation in a $\frac{1}{4}$ acre track. In January, 1981 the EPA, and therefore TDWR, no longer considered asbestos as a Class I hazardous waste. In speaking with Mr. Dick Martin of the Solid Waste Section, he stated that the TDWR now allows friable asbestos insulation to be landfilled in municipal landfills.

The Bishop Plant presently controls rainwater run-on and run-off from its $\frac{1}{4}$ acre asbestos landfill site with a two-foot berm around the site. It is estimated that this two-foot berm would provide the protection for an approximate 10 to 25 year flood for a 24 hour duration. The Bishop Plant proposes to continue this practice because of the non-leaching effect of asbestos. The Plant does maintain approximately a two-foot cover of top soil over the asbestos landfill. This is applied as the asbestos is landfilled.

Because of the Department's relaxation in allowing asbestos to be landfilled in municipal landfills, the Bishop Plant plans to continue its practice of maintaining this two-foot berm around the landfill area for asbestos. — If you do not concur with our plan, please notify me in writing.

UNITERMS

TDWR
REGISTRATION
DISPOSAL
ASBESTOS
INSULATION

Sincerely,

CELANESE CHEMICAL COMPANY, INC.



W. H. Brough
Environmental Coordinator

WEB/bjv

cc: Mr. Paul Kutchinski, TDWR
District 12, Corpus Christi

000226

TITLE

RECORD OF CONTACT

UNITERMS

W.H. Brough

DATE: June 21, 1982

TIME: 10:00 A.M.

KEY: WEB-751 Pa.

ABSTRACT

AGENCY: TEXAS DEPARTMENT OF WATER RESOURCES - AUSTIN, TEXAS

NAMES OF CONTACT(S): Mr. Dick Martin

PURPOSE OF CONTACT: To Determine if Friable Asbestos Insulation Had Been Collectively
Reclassified to a Class II Waste

COMMENTS: I called Mr. Martin for the above mentioned purpose. Mr. Martin stated that industry-wide, asbestos insulation had not been reclassified to a Class II waste. It is still classified as a Class I non-hazardous waste. However, the State does allow the asbestos insulation to be landfilled in municipal landfills.

I told Mr. Martin that I would like to arrange for my rainwater protection on the particular area where I was disposing of asbestos to be something less than a Class I requirement. He said that he saw no particular problem with this, but we should obtain TDWR confirmation. I should address my question to Mr. Jay Snow at the Solid Waste Office. Mr. Snow would in turn direct the request to whatever portion of the Solid Waste Division was necessary to review this particular information. At this particular time Mr. Martin didn't see any problem with my request.

UNITERMS

TDWR

ASBESTOS

CLASSIFICATION

WASTE

W.H. Brough
W. H. Brough

WEB/bjw

cc: Mr. J. J. Fritsch, Jr. - CCC-Bishop
Mr. J. Garza
Dr. R. R. Graham
Mr. J. F. Harper
Mr. C. W. Lee
Mr. W. H. Mayer
Mr. D. G. Pausky
Mr. G. R. Scholz

WEB File: 202.4.1.a

Mr. R. G. Brandt - CP&SC-Bishop
Mr. H. W. Hill
Mr. D. A. Rack
Mr. R. K. Coleman - Austin
Mr. R. H. Maurer - Dallas
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July 15, 82