PLAINTIFF'S EXHIBIT

DOW-2475

TEXAS OPERATIONS ES-316.1

ENVIRONMENTAL STANDARD

SCRAP METAL DISPOSAL

ST0408471

I. SCOPE

This standard is intended to provide guidelines for the disposal of scrap metal.

II. POLICY

The policy of Texas Operations regarding scrap metal is to decontaminate and recycle the metal wherever possible. Metal which cannot be decontaminated or is of no economic value shall be disposed of by Environmental Operations in an environmentally acceptable manner.

III. DEFINITIONS

Scrap metal may be ferrous or non-ferrous and includes pipes, vessels, equipment (including transformers) and etc.

IV. RESPONSIBILITY

A. The waste generator is responsible for:

1. Separation of metal from other wastes.
2. Decontamination of metals that are to be recycled.
3. Depositing the metal in dedicated "Metal Only" dempsters.
4. Coordinating with Environmental Operations the disposal of metals that cannot be decontaminated or are of no economic value.

B. Material Recovery (ext. 2102 or 5370) is responsible for the coordination and sale of scrap metals, including transformers and capacitors which contain $<$500 PPM PCB's.

C. Environmental Services (ext.5211) is responsible for disposal of metal (transformers and capacitors) contaminated with PCB's at a concentration $\geq$ 500 PPM.

D. Environmental Operations (ext. 1176) is responsible for disposal of ther contaminated metals.

V. PROCEDURES

A. Scrap metal which has economic value must be decontaminated and recycled wherever possible.

Decontaminated metal should be accumulated in a specific dempster for such metal. This metal will be recycled via a local scrap metal dealer. These dempsters are the 20 yard type (4'x8'x20')

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When dempster is full, call Material Recovery at 2102 or 5370, the caller should denote the scrap metal dempster is to be emptied and provide the box number and location.

The smaller dempsters: 2,4, and 6 yard capacity for clean scrap metal is handled by Environmental Operations, phone 2471.

Cans, buckets, drums, transformers and other miscellaneous containers are not to be placed in recycled scrap metal dempsters.

Insulation, plastic, wood, glass, rubber, trash, floor sweepings, etc. are not to be placed in recycled scrap metal dempster. All items are to be disposed of per appropriate Environmental Standard.

B. Scrap metal which is not capable of being decontaminated and/or is of no economic value is to be segregated from the recyclable scrap metal and deposited in a dempster designated for such material.

When dempster is full, the Environmental Operations Material Handling dispatcher is to be called at 2471.

The caller should denote that the contaminated metal dempster is full and needs to be hauled to the Division landfill. The caller needs to provide the dispatcher with the waste stream number.

NOTE: No metal contaminated with a RCRA defined hazardous waste is to be deposited in any metal dempster.

If metal is contaminated with RCRA waste and cannot be decontaminated, special arrangements need to be made for disposal of the metal in the Division Class I Waste Facilities.

No free liquids are to be deposited in either clean or contaminated metal dempster. Cans, buckets, pipes, etc. are to be emptied prior to placing such into appropriate dempster.

No pressure cylinders of any type, depressured or not, will be accepted as scrap metal. Call Environmental Operations (ext. 1176) for assistance with pressurized cylinders.

C. If containers are required for the routine or special one-time deposit of metals contact Environmental Operations Material Handling (ext. 2471 or 7242).

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