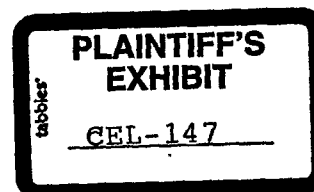


Office Memorandum

Name and Location) S. A. Davis - NYO	DATE October 29, 1982
Name and Location) A. B. Savage - Bay City	REFERENCE NO. ABS-156-82

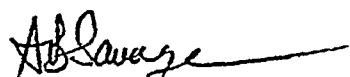
cc: J. N. Gann
C. W. Whaley
I. O. Coleman
J. B. Towers



SUBJECT: Disposal of Friable Asbestos

The attached letter was requested by Roberta to confirm in writing the information received from Allen Messenger of the TDWR on the above subject.

Since it confirms information already sent to the agency and confirmed in site inspections, I have sent the letter directly to Allen.



A. B. Savage

ABS/sj
attachment

006083



CHEMICAL COMPANY, INC.

October 29, 1982

ABS-157-82

Texas Department of Water Resources
Waste Disposition Control Unit
Box 13087, Capitol Station
Austin, Texas 78703

Attention: Allen Messenger

Subject: Disposal of Friable Asbestos

Dear Mr. Messenger:

This letter confirms our conversation of October 13, 1982 concerning the Celanese Chemical Company, Inc., Bay City Plant's handling of friable asbestos under 40CFR61, subpart B and Texas Department Water Resources rules Section 335, subpart A.

The Bay City Plant complies with 40CFR61, subpart B and more particularly 40CFR61:25 (e)(1) by:

- (a) Disposing of asbestos only when rainfall is not expected.
- (b) Opening, disposing and capping the pit on the same day.
- (c) Disposal is done in a Class I site.
- (d) Closing the pit with a three foot clay cap.

You communicated based on the above information and your interpretation of the regulations, that:

- (1) Asbestos is classified as Class I non-hazardous by the TDWR.
- (2) Section 335 subpart B (335.41-455) applies only to Class I hazardous wastes.
- (3) Our practices appear to fulfill the NESHAPS requirements.
- (4) Our practices fulfilled the requirements of Texas Administrative Code Section 335 subpart A (335.1-15) - the general regulations for Class I wastes.
- (5) Leachate collection is required only for solids containing free liquids and therefore would not apply to the asbestos.
- (6) Leachate collection should not be necessary in any event for asbestos which is not water soluble and therefore would not migrate.

I appreciate your taking time to discuss this matter with me and confirming my interpretation of the Department requirements with respect to asbestos.

A. B. Savage
Environmental Coordinator

006084

ABS/sj