

From: CORPUS::OPER 14-DEC-1990 08:42:10.80
To: @ENVIRSAFETY.DIS
CC:
Subj: DRAFT OF CONTRACTOR SAFETY PROCEDURES FOR EXCAVATION OF CONTAM. SOIL

RAO, ABS

See comments - I'm not sure how well he using this - doesn't tell me a whole lot - how can we improve?

HOECHST CELANESE CORPORATION
TECHNICAL CENTER
Corpus Christi, Texas

From: R. A. OPERSTENY
To: DISTRIBUTION

Full 12-17-90

RAO-252-90
December 14, 1990

Subj: Draft of Contractor Safety Procedures for Excavations
of Possible Contaminated Soil

PLAINTIFF'S
EXHIBIT
CEL-672

Attached is a modified draft of procedures that were used for the de-watering of HCTC's surface impoundments (ponds) last year. An early version had been generated by Jones and Neuse, our current environmental consultant, for specific cases involving EPA classified hazardous waste.

I have adapted these procedures to allow general use for modifications in our pilot plant areas where contaminated soil has been found. Footing excavation for the Mid-Scale Process Units/Pharmaceutical Intermediates, for example, will require closure procedures as described in the Pilot Plant Area Closure Plan, which calls for appropriate safety procedures, in addition to a 30-day advanced notice to the Texas Water Commission. Mundy, our on-site contractor, is currently reviewing their capabilities and training for this work. *Who does notice? ABS DID; YOU SIGNED.*
Other situations, where prior sampling has indicated waste or soil to be non-hazardous, may allow less extensive actions for handling and disposal, and should be reviewed by the ESHA department. *RAC*
Please review the attached and return comments to me or Andy Savage. *12-18-90*

Distribution:

Arnold, D. D.
Atkins, B.
Butts, S. K.
Cooper, C. E.
Hartman, L. W.
Helmer, W.
Kenesson, T. M.
Mancias, J. B.

Mather, R. W.
Muniz, T.
Nunn, D. C.
Pasquino, R.
Poole, B. R.
Pulse, C. H.
Rhyne, M.

Roberts, K. A.
Savage, A.
Starr, D.
Steele, B.
Vaughn, G. J.
Ward, J. L.
Wells, P. M.

cc:

Martinson, M. (Bridgewater-Legal)
Nativi, R. (Stubbs-Overbeck and Associates)

009022

WH
How about a procedure that deals with how to dispose of contaminated soil, pipe, etc?
DUE TO WASTE TYPE, COST OF HANDLING/DISPOSAL PROCEDURES AND OTHER VARIABLES THIS IS ALMOST A SPECIFIC DECISION - ETC. NO IDEA FOR FUTURE WORK W/ TREN TO DECREASE FUTURE PLAN COST.

- 1) SAMPLING ANALYSIS & CLASSIFICATION OF WASTE.
- 2) HOLDING (BFI BINS ETC.)
- 3) DISPOSAL METHOD