

Monsanto

Chocolate Bayou Plant

PLAINTIFF'S EXHIBIT

MON-2214

DATE May 9, 1978

G. L. Bartley

W. H. Collier

SUBJECT Asbestos Insulation Removal (7/78 - 7/79)
EPA

F. E. Crook

D. L. Meade

REFERENCE

E. C. Shelton

TO L. C. Peeler

The General Maintenance Department needs renewal of the blanket permit for asbestos insulation removal at our Chocolate Bayou Plant.

It is estimated that 40 cubic yards will be removed monthly.

The removal would be done by in-Plant, out-of-Plant Contractors and Monsanto personnel.

The permit in force now, Item VIII specifies the disposal will be at our location. Please refer to R. B. Marquez's letter dated May 2, 1978, subject "Disposal of Asbestos Insulation."

F. B. Burns
F. B. Burns

FBB/sf

Attachment

Wet -
Bauer *(CED)*

C 000347

LAM02256

Monsanto

FROM (NAME & LOCATION)

R. B. Marquez - Chocolate Bayou Plant

DATE

May 2, 1978

SUBJECT

DISPOSAL OF ASBESTOS INSULATION

REFERENCE

TO

G. L. Bartley
D. Ganchinietz - CED
J. F. Hart

S. Z. Chamberlain
F. E. Crook/C. W. Jolly
F. H. Dupre
L. C. Peeler

The present uncertainty on EPA regulations on solid waste is forcing us to delay development of a new landfill site at Chocolate Bayou. Our present plans are to stretch out the useful life of the existing site until expected EPA regulations are better defined.

For this purpose, I am requesting that arrangements be made for outside disposal of any significant amounts of insulation containing over 1% asbestos. As you are aware, this material is classified as a Class I waste and requires special packaging and handling.

Environmental Control should be contacted in advance to make arrangements for outside disposal.

R. B. Marquez
R. B. Marquez *fm*

RBM:fm

P.S. I have written the Texas Department of Water Resources requesting a waste code number for this material and should have an answer in one or two weeks.

C 000348

LAM02257

bcc: Central Files
Mr. F. C. Himes

Monsanto

MONSANTO CHEMICAL INTERMEDIATES CO.
P. O. Box 711
Alvin, Texas 77511
Phone: (713) 581-2161

July 8, 1977

Mr. John C. White
Regional Administrator
Environmental Protection Agency
Region VI
1600 Patterson Street, Suite 1100
Dallas, TX 75201

Dear Mr. White:

Re: National Emission Standard for
Asbestos - 40 CFR 61 Subpart B

This is to report the planned generation of friable asbestos waste, the method of disposal and an estimate of generation amount for the next twelve months (7/77 - 7/78).

The information below follows the indicated paragraph of 61.22(d):

- 61.22(d)(2)
- (i) Monsanto Company
 - (ii) P. O. Box 711, Alvin, Texas 77511
 - (iii) It is estimated that operations at this location will generate about 40 cubic yards per month from stripping piping and equipment surfaces during the twelve month period 7/1/77 - 7/1/78.
 - (iv) Same as (ii).
 - (v) This is an estimate of renovation of the nature described in (iii) for the period 7/1/77 through 7/1/78.
 - (vi) Individual renovations of insulation on piping and equipment.
 - (vii) Insulation will be stripped to avoid visible emissions to the outside air, kept wet as needed to avoid dust emissions, bagged or drummed wet, and sealed in leak-tight containers while wet. Containers will be labeled per 61.22 (f)(3)(i)(1).
 - (viii) Disposal will be in our own location land-fill where it will be disposed of according to paragraph 61.23 (e)(1).

Unit of Monsanto Company

C 000349

LAM022258

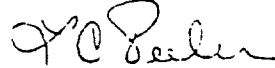
Mr. John C. White .

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July 8, 1977

If any further information is desired, or if the nature of our business does not require a report, please let me know.

Sincerely yours,



L. C. Peeler
Manufacturing Superintendent
Environmental Control

LCP:fm

C 000350

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