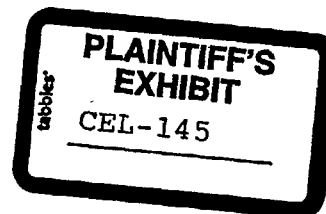


Office Memorandum

From and Location) Mr. R. H. Maurer - Dallas and Mr. S. A. Davis - NYO	DATE October 20, 1982
To and Location) A. B. Savage - Bay City	REFERENCE NO. ABS-151-82

cc: E. L. Tejml
J. N. Gann
C. W. Whaley
R. E. Allen
I. O. Coleman, Jr.
File: 303.51



SUBJECT: Bay City Plant Disposal of Friable Asbestos Insulation

Roberta Pollard-Cavalli and I discussed BCP friable asbestos disposal and I communicated to her that we:

- 1) Comply with the NESHAPS requirements for disposal of asbestos (40 CFR 61, Subpart B).
- 2) More particularly 40 CFR 61:25(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) A three foot clay cap is used for closure.

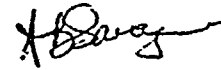
Based on Roberta's letter (RIPC-146-82 revised) and Seth's letter (SAD:390:82), I called Allen Messenger at the TDWR (Permits-Disposal Facilities) to evaluate the status of our disposal practices. Allen communicated that:

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

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- 6) He stated leachate collection should not be necessary in any event for asbestos which is not water soluble and therefore would not migrate.

Based on the above information, no reduction in regulatory requirements will be needed. The Bay City Plant will continue its past practices.



A. B. Savage

ABS/las

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