cc: CCC, BISHOP
Mr. J. J. Fritsch,
Mr. W. H. Meyer
Mr. W. Prejean
Mr. G. E. "Guy" Wallace
CCC, DALLAS
Mr. R. H. Maurer
CCC, NYO
Mr. G. A. Rodenhausen

CCCTC
Central Files (2)

CELANESE
CHEMICAL COMPANY, INC.

PLAINTIFF'S EXHIBIT
tabbies
CEL-384

CHEMCEL PLANT WHB-747 July 1, 1982

Mr. Jay Snow, Supervisor
Solid Waste Section
Texas Department of Water Resources
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Snow:

Re: TDWR Registration No. 30084

The Bishop Plant presently disposes of friable asbestos insulation in a ½ acre track. In January, 1981 the EPA, and therefore TDWR, no longer considered asbestos as a Class I hazardous waste. In speaking with Mr. Dick Martin of the Solid Waste Section, he stated that the TDWR now allows friable asbestos insulation to be landfilled in municipal landfills.

The Bishop Plant presently controls rainwater run-on and run-off from its ½ acre asbestos landfill site with a two-foot berme around the site. It is estimated that this two-foot berme would provide the protection for an approximate 10 to 25 year flood for a 24 hour duration. The Bishop Plant proposes to continue this practice because of the non-leaching effect of asbestos. The Plant does maintain approximately a two-foot cover of top soil over the asbestos landfill. This is applied as the asbestos is landfilled.

Because of the Department's relaxation in allowing asbestos to be landfilled in municipal landfills, the Bishop Plant plans to continue its practice of maintaining this two-foot berme around the landfill area for asbestos. If you do not concur with our plan, please notify me in writing.

Sincerely,

CELANESE CHEMICAL COMPANY, INC.

W. H. Brough
Environmental Coordinator

WHB/bjw
cc: Mr. Paul Kutchinski, TDWR
District 12, Corpus Christi

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