



Shell Oil Company • Shell Chemical Company
Interoffice Memorandum

JANUARY 6, 1981

251
WASTE PROBLEM

R

PLAINTIFF'S EXHIBIT

SH-1696

FROM: MANAGER ENVIRONMENTAL OPERATIONS
TO: SUPERINTENDENT ENVIRONMENTAL CONSERVATION
SUBJECT: BULK HANDLING OF ASBESTOS WASTES

We have enough asbestos waste on hand to fill three vans at 80 drums each for shipping to Texas Ecologist in Robstown at a total cost of \$5,700. We can ship the same material to CSI in Port Arthur in covered roll-off bins at a price of \$1,900 or less. We propose to try the roll-off bins and monitor the operation for compliance with RCRA and OSHA regulations.

We do not propose changing any of the present procedures used in the Complex as outlined in our Safety Orders (S-35 South, and S-125 North). The material will continue to be stored in plastic bags inside fiber drums until we are ready to ship. At the time of shipment the bags will be removed from the drums and placed in a roll-off bin.

Our present activity indicates that we can save about \$75,000 per year in the disposal of asbestos if this procedure proves acceptable. This savings does not include the cost of the fiber drums.

R. P. Frutiger suggests that you should present this concept to the breakfast meeting before we do it. Please note that we are already using roll-off bins for disposal of asbestos contaminated wastes from large dismantling projects. We remain convinced that the procedure meets all OSHA, DOT, and RCRA regulations.


J. W. Ivie

JWI:lab

cc: R. P. Frutiger
D. F. Robinson
J. T. Woods
EVC File (2)
Env. Cons. Chron. (2)

LAM 017618

DPMC-11327

ASBESTOS

Some confusion exists regarding the handling of asbestos and asbestos-containing insulation wastes. The "asbestos" regulated under RCRA has been defined by EPA as pure asbestos, and does not include asbestos-containing materials such as insulation wastes. Thus, waste insulation is not a hazardous waste, requiring disposal at sites listed in this manual. NOTE, however, that disposal of insulation waste is regulated under other statutes, primarily the Clean Air Act (asbestos is a defined hazardous air pollutant). Any landfills chosen for disposal must have specific authorization to dispose asbestos. Locations should take precautions to ensure that the landfill complies with appropriate asbestos handling/disposal standards.