


Monsanto

FROM (NAME & LOCATION) R. B. Marquez

DATE August 2, 1976

SUBJECT Insulation Disposal

REFERENCE

TO F. B. Burns

cc: R. E. Belden
F. E. Crook
J. C. Edwards
F. C. Himes
W. V. Marshall
E. C. Shelton
H. M. Walker
W. W. Wilson

Your memo of 7/19/76 requested my opinion on the environmental and legal implications of the disposal of asbestos insulation.

In addition to the OSHA requirements which Edwards has discussed with you, the Environmental Protection Agency also regulates the handling and disposal of asbestos-containing insulation. EPA's concern is on eliminating air pollution and health effects created by asbestos dust. We (E&UT) will work with Jim Edwards on developing a procedure that covers both OSHA and EPA requirements.

Until the final procedure is issued, we should dispose of insulation in the following manner:

- Non-asbestos (less than 1% asbestos) insulation should be placed in the dumpsters for off-site disposal with the plant trash. This includes the tar paper used to cover asbestos insulation.

- Asbestos insulation must be placed in the leak-tight containers and labeled as containing asbestos.

- Disposal of asbestos insulation on a daily basis is impractical. Bags should be accumulated in a captive dumpster or other type of covered trailer that can be moved to the job sites.

- Environmental Control must be notified at least two days in advance when disposal of the trailer (or dumpster) contents is necessary.

- Disposal will be in the Class I area of the plant landfill. Care must be exercised not to break the insulation containers.

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- Insulation bags must be covered with 15 inches of dirt within 24 hours after disposal. Environmental Control has the option to use the Class I operating pit or dig a separate pit for the asbestos insulation.

These are temporary guidelines that you can use until we get a better interpretation of the applicable regulations. Please call me if you have any questions.

R. B. Marquez/js

R. B. Marquez

RBM:js

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