

ETHYL CORPORATION

INTER-OFFICE

**PLAINTIFF'S
EXHIBIT**

ETCO-338

TO: Mr. R. E. Conrad ✓

FROM: Bob Boesch

SUBJECT: Asbestos Handling and
Disposal

DATE: March 12, 1979

A. Asbestos Handling

There are approximately 13 different stores stock items that contain asbestos and are "fixed" or bound by another compound, i.e. transite. These items are handled, cut or machined in Central Shops. Adequate precautions have been in effect since the installation of dust collection equipment and directed by letter to maintenance supervision on April 29, 1977. (Copy attached.)

The procedure for Cutting, Machining, Renovating, Demolition and Disposal of these materials is directed by a report submitted on November 23, 1977. (Copy attached.)

There are three stores stock items that consist of 100% asbestos fibers. These are stored in a controlled area of Stores partitioned and properly marked by Asbestos Caution signs. These materials are used for making the cell diaphragms in #1 Chlorine Shop. There appear to be no special directives written for the handling of these materials.

B. Asbestos Disposal from Demolition

January 18, 1979 instructions were written covering disposal of asbestos material obtained from renovation and demolition. (Copy attached.)

When the amount of material held on the plant in drums is sufficient to justify it, an outside disposal contractor will be hired to pick up and dispose of them according to EPA regulations.

Contact with BFI, a local disposal contractor has confirmed that they hold a license to dispose of asbestos in their site located in Livingston Parish. BFI will be available to collect our material after we have collected enough to make it economical for us to make disposal.

Crawford Construction, the contractor that is demolishing "A" & "E" lead buildings have already contracted BFI to collect and dispose of the larger quantities of asbestos insulation being removed from the TEL stills. Crawford's workers are wearing

disposable paper suits and using double canister respirators. They are also wetting down the insulation material with water before removing the insulation from the stills. The insulation is then collected in large extra strength plastic bags and disposed of in a 30 yd³ dumpster box. The box is rented from BFI.

C. Asbestos Disposal from Wet Chlorine Cells

In early February of this year I made inquiry with three other manufacturers of chlorine by the same process; Kaiser Chemical, Gramercy; I.C.I., Baton Rouge; and Georgia Pacific, Plaquemine. All three use an open pit to dewater the wet asbestos waste from their cells. This pit is on their on plant site and as yet none of them has made an attempt to cover these pits with soil.

From results of our own testing of waste asbestos, covering wet waste asbestos would be a large problem. Our test conducted by Mike Wilhelm has shown that waste asbestos will still contain approximately 70-75% water after allowing a quantity to dewater by gravity. This is believed due to the swelling of the fibers after their exposure to caustic solutions.

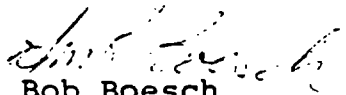
BFI has a procedure to "fix" or bind this wet asbestos in cement in order to absorb the water before covering it up with soil.

In November, 1977, Mike Wilhelm and Bob Jones submitted a report of their findings and recommendations to Don Park. (Copy attached.)

Late in January of this year I proposed to Jack Mueller of Tech Services that a sump box be installed at the outfall of the #1 shop drain in order to collect the asbestos waste and allow excess water to run off the top and through a porous side panel. The remaining slurry could then be pumped out into a sealed Dumpster Box and hauled to a licensed site.

Late in February, Jack Mueller told me that no plans are being made to trap the waste asbestos from #1 chlorine shop. There apparently are no regulations restricting asbestos waste in water and it is now doubtful that the #1 chlorine shop will be operated after the first of next year.

As reported in the last meeting of the Air, Water and Solids Pollution Abatement Program on February 28, 1979, (copy attached) asbestos solids make up less than 1% of the total solids in the North Lagoon. (Probably 85# asbestos in 25000# per day or 0.34% per day.) See report of testing by Neel Garland June 6, 1977. (Copy attached.)


Bob Boesch