

14-DEC-1990 08:42:10.80
To: @ENVIRSAFETY.DIS
CC:
Subj: DRAFT OF CONTRACTOR SAFETY PROCEDURES FOR EXCAVATION OF CONTAM. SOIL

RAO, ABS

*See comments - I'm not sure how well he using
this - doesn't tell me a whole
lot - how can we improve?*

HOECHST CELANESE CORPORATION
TECHNICAL CENTER
Corpus Christi, Texas

From: R. A. OPERSTENY
To: DISTRIBUTION

Full 12-17-90

RAO-252-90
December 14, 1990

Subj: Draft of Contractor Safety Procedures for Excavations
of Possible Contaminated Soil

Attached is a modified draft of procedures that were used for the de-watering of HCTC's surface impoundments (ponds) last year. An early version had been generated by Jones and Neuse, our current environmental consultant, for specific cases involving EPA classified hazardous waste.

I have adapted these procedures to allow general use for modifications in our pilot plant areas where contaminated soil has been found. Footing excavation for the Mid-Scale Process Units/Pharmaceutical Intermediates, for example, will require closure procedures as described in the Pilot Plant Area Closure Plan, which calls for appropriate safety procedures, in addition to a 30-day advanced notice to the Texas Water Commission. Mundy, our on-site contractor, is currently reviewing their capabilities and training for this work.

Who does notice?

Other situations, where prior sampling has indicated waste or soil to be non-hazardous, may allow less extensive actions for handling and disposal, and should be reviewed by the ESHA department. Please review the attached and return comments to me or Andy Savage.

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PLAINTIFF'S
EXHIBIT
CEL-670

*How about a procedure that deals with how to dispose
of contaminated soil, pipe, etc?*

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