PLAINTIFF'S EXHIBIT
UC-1680

UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
P. O. BOX 3370, BROWNSVILLE, TEXAS 78520

May 7, 1979

Mr. Allan M. Seils
Self Reporting Section
Industrial Solid Waste Disposal Permits
Texas Department of Water Resources
P. O. Box 13246, Capitol Station
Austin, Texas 78711

Re: Union Carbide Corporation
Brownsville Plant
Solid Waste Registration
31108

Dear Mr. Seils:

We would like to update our solid waste registration, #31108, with the Texas Department of Water Resources, issued August 10, 1977, by the addition of asbestos as a generated solid waste. We request your comments and suggestions on our proposed disposal method.

The small quantity of asbestos waste is mainly old insulation containing approximately 15% asbestos which is removed from time to time when equipment alterations or repairs are made. No new asbestos insulation is used in the plant.

The insulation is removed wet, placed in plastic bags, sealed and labeled in accordance with OSHA rules. The sealed bags of asbestos are collected on-site until there is enough for a load (approximately 1 or 2 cubic yards - every 3 or 4 months).

We propose to send the bagged asbestos to the Brownsville City landfill. The officials in charge of the landfill have agreed to accept the asbestos wastes and dispose of them properly. Your comments on this method of disposal are requested.

Both the Brownsville Union Carbide plantsite and Brownsville City landfill are located in the Brownsville Navigation District. The asbestos would be hauled by a Brownsville Navigation District collection truck to the landfill site. The collection truck would contain only the asbestos

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in sealed, properly labeled bags and the truck driver would be given instructions concerning the hazard and handling of this material. Landfill personnel would be notified prior to each shipment. We need to know if a trip ticket (Ind. Waste Shipping - Control Ticket) is required to accompany each truck carrying asbestos to this site.

Summarized, we are requesting you to include asbestos in our solid waste registration and advise us about our proposed disposal method.

If you or your staff need any other information to evaluate this request, please feel free to contact me at (512) 831-4501, extension 324 or K. G. Townsend, extension 228.

Very truly yours,

L. T. Windel

L. T. Windel
Department Head
Environmental Protection Department

LTW/grv

cc: Mr. John Sturgis, Texas Department of Water Resources, Weslaco, Texas

bcc: K. G. Townsend, Union Carbide Corporation, Brownsville, Texas

BRA 1056