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 (12) AFS

CC: A. R. Stoltenberg
 D. A. Holmes
 A. E. Wolters
 J. L. Webster
 J. W. Amacher
 R. A. Dickison
 M. E. Mayberry
 L. M. Logue
 A. F. Steinkruger
 A. C. Huston

May 13, 1975

TO: M. J. MILLER

FROM: P. S. KOEPP/R. L. LEWIS

INVESTIGATION OF CURRENT "TEFLON"® WASTE DISPOSAL

- Ref: 1) Your note of 2/21/75, to A. R. Stoltenberg, "'Teflon'® Landfill Basis"
- 2) Letter, R. L. Lewis to M. J. Miller, "Letart Landfill Disposal", 7/10/74
- 3) Letter, R. L. Lewis to A. C. Huston, "Letart Disposal - 'Teflon' Items", 8/14/74 (attached)

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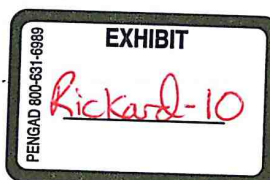
In determining if "Teflon" scrap should continue to be buried in a special landfill, currently Letart, you asked that we investigate the following:

- The reason for initially sending "Teflon" scrap to Letart.
- What is being buried at Letart?
- What are the reasons for continuing to send all "Teflon" scrap to Letart?
- What other disposal means might be suitable?

In the discussion following, we have attempted to answer these questions. Should you require more detail or additional information, please contact either of the authors.

The problems with disposing of "Teflon" waste are fear of toxicity, either from the "Teflon" itself or additives in some products. Although the fears of contamination of underground water supplies by "Teflon" scrap may be exaggerated, the possibility of small amounts of undesirable materials such as "Triton"® and C-8 being present does exist. For this reason, we have elected to not landfill "Teflon" waste at the local landfill, where large quantities of underground water serving both the Plant and the surrounding area are present.

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When the plant incinerator was originally planned, there was concern over how to dispose of "Butacite"® scrap, when the incinerator might be down for repair. Also, there was a problem handling "Delrin"® scrap during periods when the waste burner was inoperative. Tests had indicated the unsuitability of the Plant landfill for this purpose. It was decided to locate a new landfill site which would meet the following parameters:

- o Not too far away.
- o No underground aquifer.
- o Near a river.
- o Remote from habitation.
- o Of adequate size.

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Letart met all these requirements and was subsequently purchased.

"Teflon" waste was originally disposed of at sea, a very expensive and awkward procedure. Material had to be packed out in drums which were partially filled with stone to insure the drums would sink and filled drums had to be stored on plant until a sufficient number had accumulated to fill a barge. The Company suffered unfavorable publicity when a drum of waste was picked up in a fishing net, and a decision was made to discontinue this method. The Plant then arranged for disposal in the Parkersburg City landfill using a contract hauler. This arrangement was quite satisfactory until the city terminated the arrangement after several years as the landfill was filling up too rapidly. Also, the state began to regulate commercial landfills and outlawed disposing of industrial waste in them. It was about this time (1965) that the Letart site became available and disposal of "Teflon" waste was switched to the new site.

The Letart site is ideal for this purpose and the problems we have encountered have been caused primarily by failure to observe permit limitations. Current life of the landfill is estimated at 24 years, and more fill sites are available on, or adjacent to the property.

The current permit allows disposal of any dry solid material, non-toxic in nature, and which contains no leachable components. Also excluded are "Butacite" and "Delrin" waste due to formation of degradation products. All "Teflon" solid waste is sent to Letart except spent calcium chloride from HF absorbers which is still dumped at the old Plant landfill site. Scrap pipe and other metals removed from the "Teflon" process are also buried at Letart.