

FROM ROY H. CARWILE
PITTSBURGH OFFICE

TO MR. A. A. RAMBIKUR
PT. COMFORT OPERATIONS

September 16, 1976

RE: SOLID WASTE DISPOSAL AREA

I again suggest that you proceed to select a more suitable site for disposal of solid wastes at Pt. Comfort, register it with the TWQB, and abandon the present site. A new location further to the south would be closer to the plantsite, above the water table, away from the estuary and approvable by the TWQB.

The Corps of Engineers is authorized (under Sec. 404 of the Federal Water Pollution Control Act) to regulate the deposition of materials (fill) in or near navigable waters. Their letter confines itself to those regulations. If the TWQB (which has regulatory power over surface and groundwaters as well as solid waste disposal) were to visit the present site, I am sure that they would stop disposal there immediately. I recognize that you must balance the risk of an "unauthorized" visit by TWQB against the cost of establishing a new area for disposal of solid wastes. I believe, however, that the risk of discovery and potential citation increase each day. I also feel that the current location is inconsistent with Alcoa's policies toward protection of the environment.

I would suggest that in closing the current location you do the following:

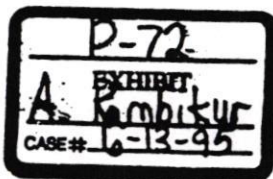
1. Fill in the central portion of the area and the entire surface and outside slopes to a depth of three feet.
2. Crown and seed the surface to drain runoff to the northeast and southeast.
3. Permanently post the area as required by OSHA regulations as to mercury and asbestos-containing wastes.

I hope that you will choose to abandon the present site rather than continue to use it and risk citation and the rapid selection of a new location.

Ry
ROY H. CARWILE

RHC:vb

cc: P. R. Atkins - 7 AB
W. W. Browne - Pt. Comfort
D. W. Gann - Pt. Comfort
C. L. Green - Rockdale
C. H. Phillips - Pt. Comfort
F. A. Sharkey - Pt. Comfort



99-002 (REV 11 66)

Defendants' Exhibit
25993

CONFIDENTIAL A1079

2751

file

~~A. A. RAMBIKUR~~
A. A. RAMBIKUR 49

FROM A. A. RAMBIKUR
POINT COMFORT OPERATIONS

TO MR. R. H. CARWILE
PITTSBURGH OFFICE - 7

cc: Mr. F. A. Sharkey - Point Comfort
Mr. C. H. Phillips - Point Comfort
Mr. W. W. Brown - Point Comfort
Mr. D. W. Gann - Point Comfort
Mr. C. L. Green - Rockdale
Dr. P. R. Atkins - Pittsburgh

February 9, 1977

RE: SOLID WASTE DISPOSAL AREA

Thank you for your letter of September 16, recommending a more suitable site for disposal of solid wastes at Point Comfort. Admittedly the present site might be considered as less than ideal, but it is there and it is working. This site was registered with the Texas Water Quality Board July 7, 1976 (Reg. No. 30035).

The only written unfavorable comment we have received on the site has been from the Corps of Engineers with regard to possible encroachment upon the wetlands or navigable waters. All local management responsible have been cautioned to not dump on the outer perimeter of the dike. I do not feel that we have a problem with contaminated water seeping through the dike onto the marsh and wetlands.

If the site were moved closer to the plant, some money would be saved by reducing the haulage miles. However, we would still have a serious water and drainage problem at the new site and would possibly have to install a pump and periodically drain the solid waste pit to the storm lake drainage system. We would also have the burden and expense of another long drawn out negotiation with TWQB on test wells, liners and site management whereas the present site should probably get us by for another 8 - 10 years without further negotiation or unusual capital expenditure.

A. A. RAMBIKUR

AAR:vh



P-73
EXHIBIT
A. A. Rambikur
CASE# 1-13-95

Defendants' Exhibit
25994

20-0000 (REV 11-66)

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