JUNE 30, 1997

MR. JOHN CROWDER, III, R.S.
NC. DEPT OF ENVIRONMENT, HEALTH AND
NATURAL RESOURCES
127 CARDINAL DRIVE EXTENSION
WILMINGTON, N.C. 28405

TEN YEAR SOLID WASTE MANAGEMENT PLAN FOR THE
DUPONT CAPE FEAR SITE

Dear Mr. Crowder,

Enclosed is a copy of our Ten Year Solid Waste Management Plan for the Dupont Cape Fear site as required by the North Carolina Solid Waste Management Act of 1989 as amended by House Bill 859 in 1996. This plan was prepared in accordance with House Bill 859 and is being submitted by the Cape Fear Site.

Should you have any questions please contact Penny Mahoney, Responsible Care Leader, on (910) 371-5232 or John White, Site Waste Specialist, on (910) 371-4409.

Sincerely,

Penny Mahoney
Responsible Care Leader
TEN YEAR SOLID WASTE
MANAGEMENT PLAN FOR THE
DUPONT CAPE FEAR SITE

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[Signatures]

Penny Makary
Responsible Care Leader

John St. White
Environmental Technician

REV. 0
Introduction

The Dupont Company is committed to the reduction of waste and emissions. We have an ultimate goal of zero waste and emissions. At the Cape Fear site we have fully supported this effort. We recover for reuse 77 MM lbs of Ethylene Glycol per year from our glycol refining facility. We also have a methanol recovery unit and several other units that are used for recovery. We send metal-bearing secondary materials off-site to metal reclaimers. We have reduced process sample frequencies and switched to on-line measurements in order to reduce waste samples. We have reduced Sara 313 emissions by 66% since 1987 and are continuing to reduce these emissions. We have an active site recycling program and recycled 3 tons in 1996 with 10 tons projected in 1997. We also operate a Petretec* facility which converts used film back to its major raw materials which are DMT and Ethylene Glycol.

This solid waste minimization plan was prepared as required by Section 16, Paragraph 130A-309.09D of the North Carolina Solid Waste Management Act of 1989 as amended by House Bill 859 in 1996.

At Cape Fear we have three industrial landfills on-site. Our coal ash landfill was closed this year per state regulations. Our demolition landfill will close in 1998. Therefore, this waste minimization plan will not address the demolition landfill.

Our plans are to continue to operate our TPA Landfill # 2. This landfill is currently permitted to accept wastewater treatment plant sludge, crude terephthalate, dimethyl terephthalate, coal ash, incinerator ash, and Dacron* polymer. We plan to request permission from the state to add the following wastes to our permit for the TPA landfill: asbestos, sandblast residue, water treatment filter media, and spent water softener and demineralizer ion exchange resins.

The basis for this waste minimization plan is to reduce the landfilling of waste listed above by a total of 25% from the 1996 volume of 25 M tons. This includes waste landfilled both on and off site.

The annual amount of two of the wastes landfilled, asbestos and construction/demolition debris, are a function of the amount of construction and renovation activity at the site and are not necessarily directly related to production rates. Waste asbestos generation is part of our program to eliminate all asbestos materials from potential worker exposure. Therefore, we did not consider this stream when setting a waste reduction goal. Likewise, the generation of construction/demolition debris is not amenable to waste reduction beyond our current practices. When we site expansions or other construction activity we attempt to use existing structures and equipment when feasible.
Waste Reduction Goal

It is the Cape Fear site's goal to reduce the amount of nonhazardous industrial waste disposed of by landfilling by a minimum of 25% by weight by July 1, 2007, using 1996 as the base year.

Waste Reduction Strategy

The Cape Fear site's strategy for achieving our goal involves two primary methods:
1) source reduction in order to reduce the amount of waste generated, and 2) the recycling or reuse of wastes in a beneficial manner.

Waste Management/Reduction Options

Coal Ash

The potential options of switching to either oil or gas as fuel or retrofitting the boilers to improve combustion efficiency are not cost-effective. We have been working with vendors to investigate reuse of coal ash in various end uses such as structural fill.

Wastewater Treatment Plant Sludge/Dredgings

The amount of biosolids produced is generally a function of production volume at the site. Most of the biosolids generated are landfarmed and are not included in this plan. However, part of the volume is generated by dredging of the concrete basins on a periodic basis. We will investigate methods to reduce the amount of solids sent to the basins by reducing their generation or recycling them back to the process.