

July 28, 1997

## BASF LANDFILL WASTE MANAGEMENT PLAN

Based upon the twelve months ending July 1997, there was a total of 19.8 million pounds of waste sent to the BASF Enka Landfill. Of this total, 82% was fly ash and cinders from our Power House, 2 % was sludge from our Water Filter Plant, and 13% was bio-sludge use as a dressing for the fill cover.

These sources account for 97 of the waste sent to the Enka Landfill. The remaining 3% was mostly synthetic fiber (nylon , melamine) waste or inert construction debris.

Based upon this operating scenario, BASF finds it extremely difficult to comply with the the "letter" of the request made in the April 29, 1997 memo from the Solid Waste Section of DEHNR.

As for a waste reduction goal, the miscellaneous waste is of a deminimus quantity and the bulk of the waste is directly related to the level of operation of our Power House, WWTP, and Water Filter Plant.

We have already, since 1994, due to the shut down of our Caprolactam Recovery Plant and our BCF Fiber Plant, and the sale of the Colback and Geomatrix operation to Akzo-Nobel drastically reduced the waste going to our landfill (12,300 tons in '95-'96 vs. 9,915 tons in '96-'97). Any further reductions would be as a result of the discontinuance of operations here at the Enka Site. Hopefully, this will not occur.

Therefore, with no known alternative uses for fly ash, cinders, or water treatment sludges, we anticipate no significant waste reduction in the near future.

As for options considered for alternative methods of disposal, the only one considered was the returning of fly ash to the coal mines via the returning coal trucks. This is a more expensive alternative to landfilling it here at Enka. And, since the fly ash would ultimately end up back in the ground in Kentucky, it is not seen as a superior alternative from an environmental standpoint.

Our waste management strategy will be to continue to operate our landfill as we are currently doing as long as permitted to do so by the State and or Federal Regulators. The anticipated life of the landfill is difficult to measure but is estimated to be 8 to 10 years at current fill rates.

  
Ray Ackerman  
Environmental Manager



