



INDUSTRIAL INSULATION, SCAFFOLDING, FIREPROOFING & REFRACTORIES

P.O. BOX 4074 • 333 WESTCHESTER • PHONE (512) 884-4906 • TELEX 154 154
FAX (512) 884-0695

PLAINTIFF'S EXHIBIT

CC-237

April 1, 1991

Eppy Gonzalez
Coastal Refining & Marketing
P.O. Box 521
Corpus Christi, Texas 78403

RE: General Liability

Dear Mr. Gonzalez:

After receiving your letter of March 26, I have instructed our agent to reference our coverage for Asbestos Abatement on the certificate. You should receive the new certificate this week.

As you are already aware this coverage is only valid through July 1, 1991. By that date we will have coverage in force with an "A" rated company. Employers Casualty was an "A" rated company when we renewed coverage last July. You can rest assured we will always work to have the best coverage available for any craft we perform. At no time have you been at risk due to inadequate coverage.

If you have any questions please give me a call at 884-4906.

Regards,


Chip Hough
President

CED0006224

March 28, 1991

Spoke to Chip with Gilman Insulation concerning their insurance coverage and discussed the following:

He will have his agent correct our name to read Coastal Refining and Marketing, Inc.

He will send a brief explanation of to their use of Employers Casualty Insurance - they are the only company that does not separately exclude asbestos abatement, (in other words, its cheaper). Gilman does have this coverage and will have it added to the face of their policy under general and excess liability.

There is a possibility that they will be changing companies in July.



CERTIFICATE OF INSURANCE

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. SHOULD ANY OF THE POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED:

ISSUE DATE OF THIS CERTIFICATE

2-1-91

ISSUED AT

Corpus Christi, Texas

CERTIFICATE HOLDER

Coastal State Refinery
P. O. Box 109
Corpus Christi, Texas 78405

INSURED

Gilman Insulation Co., Inc.
P. O. Box 4074
Corpus Christi, Texas 78469

- ☐ 1 TEXAS EMPLOYERS' INSURANCE ASSN. • DALLAS, TX
- ☐ D TEXAS EMPLOYERS INDEMNITY CO. • DALLAS, TX
- ☐ 2 EMPLOYERS CASUALTY COMPANY • DALLAS, TX
- ☐ 3 EMPLOYERS NATIONAL INSURANCE CO. • DALLAS, TX
- ☐ 7 EMPLOYERS CASUALTY CORPORATION • DALLAS, TX
- ☐ 8 EMPLOYERS NATIONAL INS. CORP. • DALLAS, TX
- ☐ E EMPLOYERS OF TEXAS LLOYD'S • DALLAS, TX
- ☒ X International Insurance Co.

Authorized Representative

(Signed)

(Typed)

Don Lee

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

TYPE OF INSURANCE	CO. NO.	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS		
WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	2	WC-25X2304*	1-1-91	1-1-92	STATUTORY		
					\$ 500	(EACH ACCIDENT)	
					\$ 500	(DISEASE-POLICY LIMIT)	
					\$ 500	(DISEASE-EACH EMPLOYEE)	
GENERAL LIABILITY	2	CGL-512070	7-1-90	7-1-91	GENERAL AGGREGATE		
☒ COMMERCIAL GENERAL LIABILITY					\$ 2,000		
☐ CLAIMS MADE ☒ OCCURRENCE					\$ 2,000		
☐ OWNER'S & CONTRACTORS PROTECTIVE					\$ 1,000		
☒ X, C, U					PERSONAL & ADVERTISING INJURY		
					\$ 1,000		
					EACH OCCURRENCE		
					\$ 1,000		
					FIRE DAMAGE (ANY ONE FIRE)		
					\$ 50		
					MEDICAL EXPENSE (ANY ONE PERSON)		
					\$ 5		
AUTOMOBILE LIABILITY	2	BAA-605876	7-1-90	7-1-91	CGL	\$ 1,000	
☒ ANY AUTO							
☒ ALL OWNED AUTOS							
☒ SCHEDULED AUTOS							
☒ HIRED AUTOS					BODILY INJURY (PER PERSON)	\$	
☒ NON-OWNED AUTOS					BODILY INJURY (PER ACCIDENT)	\$	
☐ GARAGE LIABILITY					PROPERTY DAMAGE	\$	
EXCESS LIABILITY	X	524206870-2	7-1-90	7-1-91		EACH OCCURRENCE	AGGREGATE
☒ Umbrella					\$ 5,000	\$ 5,000	
☐ OTHER THAN UMBRELLA FORM							
OTHER							

*Excludes Masters & Members of the Crews of Vessels.

cc: NGA Coastal States Refinery has been endorsed to above mentioned policies (except WC-25X2304) as Additional Insured. Waiver of Subrogation has been endorsed to above mentioned policies in favor of Coastal States Refinery



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ISSUE DATE OF THIS CERTIFICATE

1-4-91

ISSUED AT

Corpus Christi, Texas

CERTIFICATE HOLDER

Coastal States Refinery
P. O. Box 109
Corpus Christi, Texas 78405

- ☐ 1 TEXAS EMPLOYERS' INSURANCE ASSN. • DALLAS, TX
- ☐ 0 TEXAS EMPLOYERS INDEMNITY CO. • DALLAS, TX
- ☐ 2 EMPLOYERS CASUALTY COMPANY • DALLAS, TX
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- ☒ International Insurance Co.

INSURED

Gilman Insulation Co., Inc.
P. O. Box 4074
Corpus Christi, Texas 78469

Authorized Representative

(Signed)

(Typed)

Don Lee

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					\$ 500	(DISEASE-POLICY LIMIT)
					\$ 500	(DISEASE-EACH EMPLOYEE)
GENERAL LIABILITY					GENERAL AGGREGATE	\$ 2,000
☒ COMMERCIAL GENERAL LIABILITY					PRODUCTS COMP/OPS AGGREGATE	\$ 2,000
☐ CLAIMS MADE ☒ OCCURRENCE	2	CGL-512070	7-1-90	7-1-91	PERSONAL & ADVERTISING INJURY	\$ 1,000
☐ OWNERS & CONTRACTORS PROTECTIVE					EACH OCCURRENCE	\$ 1,000
					FIRE DAMAGE (ANY ONE FIRE)	\$ 50
					MEDICAL EXPENSE (ANY ONE PERSON)	\$ 5
AUTOMOBILE LIABILITY					CIL	\$ 1,000
☒ ANY AUTO					BODILY INJURY PER PERSON	\$
☒ ALL OWNED AUTOS	2	BAA-605876	7-1-90	7-1-91	BODILY INJURY PER ACCIDENT	\$
☒ SCHEDULED AUTOS					PROPERTY DAMAGE	\$
☒ HIRED AUTOS						
☒ NON-OWNED AUTOS						
☐ GARAGE LIABILITY						
EXCESS LIABILITY					EACH OCCURRENCE	\$ 5,000
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**GILMAN
INSULATION
CO., INC.**

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**COASTAL STATES REFINING AND MARKETING
ASBESTOS ABATEMENT EQUIPMENT RENTAL RATES**

	DAILY RATE

TYPE C BREATHING AIR SYSTEM, INCLUDES CO MONITOR, LOW PRESSURE ALARM, POWER FAILURE ALARM, LCG MANIFOLD FOR 8 WORKERS, SHELL & TUBE AFTERCOOLER, HIGH PRESSURE MANIFOLD & REGULATOR FOR BACK-UP SYSTEM OF GRADE D BOTTLED BREATHING AIR.	\$ 30.00
FULL-FACE AIR-PURIFYING RESPIRATOR	3.75
TYPE C POSITIVE PRESSURE OR PRESSURE-DEMAND FULL-FACE RESPIRATOR W/REGULATOR	6.00
MOBILE DECONTAMINATION FACILITY	90.00
2000CFM NEGATIVE AIR UNIT,	
OPERATING	8.50
BACK-UP	2.50
175CFM AIR COMPRESSOR	32.50
HEPA-FILTERED VACUUM CLEANER W/ATTACHMENTS	
U2930	12.50
GS-81	15.00
GS-82	20.00
GS-83	32.50
PORTABLE 3-GALLON MIST SPRAYER	1.50

Effective 9-19-88
GILMAN LABOR RATES AT COASTAL STATES

*Coastal
States*

SUPERINTENDENT G-10	\$ 18.64/hr.
FOREMAN G-4	17.25
MECHANIC G-1	15
MECHANIC II G-2	13
HELPER G-3	8.75

OVERTIME

SUPERINTENDENT	\$ 27.21/hr.
FOREMAN	25.33
MECHANIC	23.06
MECHANIC II	19.41
HELPER	12.77
TRUCK GE-1	30.00/per day
SAFETY SHOWER GE-2	45.00/per day
VACUUM GE-3	12.50/per day