

INTER-COMPANY MEMO



JHA
PLAINTIFF'S
EXHIBIT

KRC-66

DATE March 3, 1986
TO Distribution List Below

FROM D. F. Janes
SUBJECT ASBESTOS INSULATION DEMOLITION AND REMOVAL

The two attached pieces of correspondence are self-explanatory. Briefly stated, OSHA is requesting that we notify their local office when we conduct asbestos demolition or removal. This request pertains to work performed by Koch or a contractor.

Your cooperation in providing me with an "early warning" of such work will be appreciated. I will then notify OSHA of our planned work.

D. F. Janes
D. F. Janes ^{vpc}

Distribution: JHA, JJB, JTC, RMC, EBD, JME, REF, MJH, ERH, HFH,
RDH, JPH, SAH, JDJ, JRK, DLL, EAP, KLS, CJW, RDW,
All Process and Refinery Engineers

DFJ/vpc
Attachments (3)

K018250

U. S. Department of Labor
Corpus Christi Area Office
Government Plaza
400 Mann Street, Room 300
Corpus Christi, TX 78401
512-888-3257

Occupational Safety and Health Administration

Reply to the Attention of: RLMH:keg



February 12, 1986

Koch Refining Co.
P.O. Box 2608
Corpus Christi, TX 78403

Attn: Mr. Dale James, Safety Manager

Dear Mr. James:

The Occupational Safety and Health Administration is currently conducting a National Emphasis Program for programmed health inspections of establishments where asbestos is used, stored or processed. Also included in this National Emphasis Program are any sites involving asbestos demolition and removal activities. (OSHA Instruction CPL 2.60B)

Currently OSHA receives notices regarding the asbestos demolition/removal activities from the Environmental Protection Agency and the Texas Air Control Board, but in an effort to improve its response time OSHA respectfully requests that your company notify us of any asbestos demolition or removal activities on your site.

OSHA would like for you to also inform your asbestos demolition/removal contractors of the assistance available from our local office. The local OSHA Office functioning as a full service office resource center will gladly meet with any asbestos demolition/removal contractors prior to their scheduled work. The 29 CFR 1910.1001 Asbestos Standard will be fully discussed including viewing of a video tape and/or slides. Also in this session will be a discussion of respiratory protection, other PPE and specific monitoring requirements.

For notification purposes the address of our office is as follows:

U.S. Department of Labor, OSHA
Government Plaza
400 Mann Street, Room 300
Corpus Christi, TX 78401
(512) 888-3257

Together we can make the workplace safer and more healthful.

Sincerely,

R. L. Mike Hunter
R. L. MIKE HUNTER
Area Director

K018251



January 29, 1986
AP-86-08

Mr. Tom Palmer, P.E.
Regional Director
Texas Air Control Board
5602 Old Brownsville Road
Corpus Christi, Texas 78415

RE: Asbestos Removal Notification

Dear Mr. Palmer:

Please accept this letter and attachment as notification of intent to remove friable asbestos as mandated by 40 CFR 61.146.

We have based this notice of asbestos removal on planned turnarounds and process revamps for the year 1986. The estimated quantities have been determined using plans for piping and equipment modifications. If you have any questions regarding this notification, please call.

Yours truly,

KOCH REFINING COMPANY

A handwritten signature in dark ink, reading 'John R. Kampfhengel', written in a cursive style.

J. R. KAMPFHENKEL
Chief Environmental Engineer

JRK:lj1
Attachment

cc: DFJ

K018252

JOB DESCRIPTION

OWNER OPERATOR - Koch Refining Company - Corpus Christi Refinery

MAILING ADDRESS - P. O. Box 2608, Corpus Christi, Texas 78403

PHYSICAL LOCATION - Off Interstate 37 at Suntide Road, 7 miles Northwest of Corpus Christi

JOB DESCRIPTION - Demolition, removal, and salvage of asbestos insulation in the following refinery units during 1986

<u>Process Unit</u>	<u>Removal Date</u>	<u>Estimated Quantity</u> (Piping)	
		<u>Linear Ft.</u>	<u>Square Ft.</u>
Ultraformer	February	200	---
East Crude	March, April	200	---
Fluid Cat Cracker	Feb., Mar., Apr.	600	2,100
Cumene	March, April	800	---
Alkylation	March, April	300	---
Alkar	March, April	400	---
Unifiner	March, April	200	---
LERU	March, April	300	---
Platformer	March, April	300	---
Hydeal	March, April	100	---
		3,400	2,100

REMOVAL METHOD - Every effort will be made to restrict the amount of asbestos emissions. The majority of the removal will be carried out in a remote area of the refinery. A small amount of asbestos may be removed in operating units which will be shut down for turnaround or revamp work. The asbestos will be wet down with water and bagged wet.

DISPOSAL SITE - Arrangements have been made with Texas Ecologists, Inc. of Robstown, Texas to handle disposal of the properly identified sacks of asbestos contaminated material.

REPLACEMENT MATERIAL - All material used to replace removed insulation will be new and asbestos-free.