

SHELL CHEMICAL COMPANY

RE PLAINTIFF'S EXHIBIT

SH-2024

DATE FEBRUARY 27, 1975

TO DEER PARK MANUFACTURING COMPLEX -
SUPERINTENDENT-CHEMICAL
DEER PARK MANUFACTURING COMPLEX -
ENGINEERING - SUPERINTENDENT
DEER PARK MANUFACTURING COMPLEX -
PURCHASING - MANAGER

FROM STAFF ENGINEER - ENVIRON-
MENTAL CONSERVATION-REGULATIONS -
DEER PARK MANUFACTURING COMPLEX

SUBJECT HANDLING OF ASBESTOS-COVERED
PIPE AND STRUCTURAL STEEL
DURING DEMOLITION RELATIVE
TO EPA AND OSHA REGULATIONS

Asbestos is classified as a hazardous material and is subject to both OSHA and EPA regulations. Removal, handling, and disposal of asbestos-covered pipe and structural steel during demolition is of specific concern in the field work for BA expansion scheduled to begin mid-February. The applicable regulations are OSHA - "CFR 29 Part 1910.93a, Asbestos subparagraph (h)(2) Waste disposal" and EPA - "CFR 40 Part 61.22 Emission standard, subparagraph (d) Demolition".

The EPA regulation requires notice to the EPA ten days before starting of demolition of the procedures to be employed; wetting of asbestos material opened to the environment and careful handling are generally specified. "Friable asbestos debris shall be wetted adequately to insure that such debris remain wet during all stages of demolition and related handling operations."

The OSHA regulation calls for "asbestos debris which may produce in any reasonable foreseeable use, handling, or transportation, airborne concentrations of asbestos fibers in excess of the standard shall be collected and disposed of in sealed impermeable bags or other impermeable containers".

At issue is the establishment of a precedent of (1) removing all asbestos wet in the field and bagging for disposal in an approved landfill or (2) wetting the asbestos as necessary to safely remove the pipe sections and handle the asbestos with weather cover in our scrap yard with the scrap dealer picking up such covered pipe and assuming liability for further proper handling.

The first choice was followed in some work at Marietta. We are currently following the second choice in our present maintenance/construction. If we elect to continue the present practice, some additional steps need be taken to prevent friable asbestos from emitting fibers. Further, we must assure ourselves that the scrap dealer will assume proper asbestos control of material picked up.

I recommend we follow the present practice, Choice 2, with the following additional safeguards provided by Purchasing:

1. All exposed asbestos covering to be spray coated with some sort of sticky mastic.
2. A letter be obtained from our scrap dealer indicating his knowledge of the appropriate rules and intent to follow same.

DPMC-02674

LAM 005058

will be immediately
The required notification to the EPA ~~is being written today~~ with
the concurrence of Cal Hansen, Project Manager, BA Expansion.

CHR:oc

Cal Hansen
cc: R. V. Mattern
F. G. Reitz
D. F. Trichel
File
Chron

C. H. Rivers
C. H. Rivers

The required notification to the EPA will
be written outlining our present practice of
removing spools covered with asbestos (including any
opened asbestos) from the unit with opened
asbestos insulation spray painted before removal
of such pipe by the scuf dealer.

CHR

Report Toxic Substances
1975 8/11.4

LAM 005057

DPMC 02673.1