



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

VICTORIA PLANT
P. O. Box 2626
VICTORIA, TEXAS 77901

bcc: 1) J. R. Cooper
2) G. J. Holloman
1) R. E. Keith
2) J. O. Walling
1) B. Huante
2) M. K. Ahlstrom
V. P. File 60-70

PETROCHEMICALS DEPARTMENT

September 1, 1983

Mr. Bill Stewart (2)
Executive Director
Texas Air Control Board
6330 Highway 290 East
Austin, TX 78723

Attention: K. A. Langley
Compliance

RE: Accounting of Asbestos Insulation
Removal Since February 11, 1983 and
Notice of Future Removal: Du Pont,
Victoria County, Texas

Dear Mr. Stewart:

1. Accounting

Since February 11, 1983, we have sent you five notices of asbestos removal per requirements of the National Emission Standard for Asbestos (Par. 40 CFR 60.20-.25). The following gives a final accounting of amounts removed.

• February 11, 1983 Notice:

Under this notice we removed approximately 1,500 linear feet of asbestos insulation, mostly only 2-3 feet at any given place. In addition, approximately 10 square feet were removed from vessels for inspection.

• May 31, June 7, and June 22, 1983 Notices:

These notices pertained to extensive insulation removal from stainless steel equipment because of stress corrosion cracking. A total of 13,040 square feet plus approximately 8,000 linear feet of piping insulation was removed.

• June 30, 1983 Notice:

This notice told you that starting July 30, 1983, removal of asbestos insulation from equipment in our Hydrogen plant might be necessary if stress corrosion cracking was found. It was, and approximately 4,470 square feet of insulation was removed.

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DU 011651

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Thus total asbestos insulation removed was 17,500 square feet from vessels and 9,500 linear feet from piping.

As described in our earlier notices, the removal job was supervised by Du Pont personnel to insure proper safeguards, work practices, and disposal procedures were followed. All asbestos was "wetted" before handling. Respiratory protection was worn as required along with proper protective clothing. Caution signs were appropriately placed to alert workers to the presence of asbestos and that necessary precautions must be taken before entering the area. All asbestos was disposed of on the Du Pont Victoria Plant in a disposal area registered by the Texas Department of Water Resources (Solid Waste Registration 30079). All asbestos was placed in sealed plastic bags at the point of removal and kept sealed during movement and disposal on site.

2. Notice of Future Removal

During the remainder of 1983, E. I. du Pont de Nemours & Co. (Inc.), the owner, whose address is P. O. Box 2626, Victoria, Texas 77902, plans to remove asbestos containing insulation from various pipe flanges mostly in our Adiponitrile plant to inspect and clean process piping. Each flange will require removing 2-3 feet of insulation. It is very unlikely that more than 260 linear feet will be removed on any given day or from any given process line but the sum total will probably exceed 260 feet. How much depends on what is found on inspection. Based on experience to-date the amount is estimated to be about 1,000 feet. Removal and disposal will be handled as described above.

Since discovery of the stress corrosion cracking problem described in our May 31, 1983 notice to you, we cannot predict with much reliability when and how many square feet of insulation we may have to remove from stainless equipment during any given time period. We will try to give as much advance notice as possible.

Please contact me at (512) 572-1277 if you have any questions.

Very truly yours,

Andy Nickolaus

A. H. Nickolaus
Senior Environmental
Control Consultant
Engineering Division

cc: H. P. Kutchinski
TDWR - Corpus

W. T. Palmer
TACB - Corpus

AHN/cgh

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