DOCUMENT NO. 16

PLAINTIFF'S EXHIBIT
RMC-389

REYNOLDS ALUMINUM

PRIMARY METALS DIVISION

February 26, 1987

Mr. W. T. Palmer
Regional Supervisor
Texas Air Control Board
5602 Old Brownsville Road
Corpus Christi, TX 78415

Dear Mr. Palmer:

This letter is to inform you of our plans to remove asbestos containing material as part of our dismantling operations at the Reynolds Metals Company San Patricio Plant. Information concerning this project is listed below.

1. Name and address of owner:

   Reynolds Metals Co.
   San Patricio Plant
   P.O. Box 9177
   Corpus Christi, TX 78469

   Location of plant: Highway 361 between Gregory and Ingleside, TX

2. Description of facility:

   Plant was used for primary aluminum production and is now permanently closed. It began production in 1952.

3. Estimated amount of asbestos containing material:

   12,600 sq. ft. on internal combustion engines and associated equipment.

   1,910 lineal feet on assorted piping.

4. Starting and completion dates:

   Start: March 30, 1987
   Completion: June, 1988 (estimated)

5. Nature of planned demolition and methods to be used:

   Asbestos containing material (ACM) covers the exhaust headers of 49 large internal combustion engines but the ACM will not be removed from the header pipe. The ACM and header pipe will be thoroughly wetted, wrapped in 6 mil plastic sheet, and sealed with tape. Each section of header will then be disconnected at flanges which connect the header sections and which are not covered with ACM. The sealed header sections with the ACM on them will be labeled and disposed of in an approved landfill (Waste Disposal Center at Sinton, TX). All applicable EPA and OSHA regulations will be followed.

   Piping (less than 6 in. diameter) will be dismantled as outlined above where feasible. If the ACM must be removed from the pipe, applicable procedures will be followed as required by EPA and OSHA regulations.

Sincerely,

REYNOLDS METALS COMPANY

C. D. Hester

C. Doyce Hester
Environmental & Laboratory Manager

cc: Mr. G. W. Dressen - Plant Manager

Asbestos NESHAPs Contact
Air & Waste Management Division
USEPA - Region 6
1201 Elm Street
Dallas, TX 75270

Certified Mail No. 193683
#193684 to file

CC: C.R. Bent 9-18-87

Three of the Cooper-Bessemer engines were sold to Exxon Company - USA in December, 1986. The ACM insulation on these engines was removed by an Exxon contractor, J & J Insulation and Acoustics, Inc., located in Corpus Christi. Exxon sent the required notification to the Texas Air Control Board and EPA. The contractor removed 51 bags of ACM and the material was transported to Waste Disposal Center near Sinton for disposal. We executed the Waste Manifest for this shipment.

Since there was a large amount of ACM in the Power Plant, an approved asbestos removal contractor, Industrial Specialists, Inc., P.O. Box 1630, Lake Jackson, Texas 77566, was used for removal of the remaining material. This work was performed in December, 1987 (Construction Contract No. 006148-SP) and the material was shipped to Waste Disposal Center for disposal. The remaining ACM at the Power Plant consisted of about 500 feet of covering on high-voltage electrical cables in four manholes and it was removed in January, 1989 by Industrial Specialists. After removal, it was transferred to the Sherwin Plant and deposited in a special ACM container for transport to Waste Disposal Center for disposal with the ACM they were removing from process equipment. All of the ACM disposal shipments are tabulated in Table 10, "Waste Asbestos Shipment Record."

The demolition contractor was to remove additional small amounts of ACM from the Chemical Laboratory and First Aid buildings before March 31, 1989. Also, a small amount of ACM on hot water and steam lines in the equipment room of the Office Building (Facility #10) remains. This ACM was sealed and encapsulated in December, 1987 by Industrial Specialists.

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TABLE 10

REYNOLDS METALS COMPANY
SAN PATRICIO PLANT

WASTE ASBESTOS SHIPMENT RECORD

TDWR MANIFEST #	MATERIAL	QUANTITY	UNIT	TWC WASTE #	DATE SHIPPED	TSD FACILITY
00254094	WASTE ASBESTOS	51	BA	179390	09-Dec-86	WASTE DISPOSAL CENTER
00337040	ASBESTOS & PIPE	24,800	P	179390	16-Mar-87	WASTE DISPOSAL CENTER
00337041	ASBESTOS & PIPE	15,760	P	179390	17-Mar-87	WASTE DISPOSAL CENTER
00337042	ASBESTOS & PIPE	15,720	P	179390	19-Mar-87	WASTE DISPOSAL CENTER
00337043	ASBESTOS & PIPE	14,580	P	179390	25-Mar-87	WASTE DISPOSAL CENTER
00337044	ASBESTOS & PIPE	12,060	P	179390	13-Apr-87	WASTE DISPOSAL CENTER
00337045	WASTE ASBESTOS	20	Y	179390	04-Dec-87	WASTE DISPOSAL CENTER
00337048	WASTE ASBESTOS	25	Y	179390	10-Dec-87	WASTE DISPOSAL CENTER
00337051	WASTE ASBESTOS	25	Y	179390	16-Dec-87	WASTE DISPOSAL CENTER
00337052	WASTE ASBESTOS	30	Y	179390	16-Dec-87	WASTE DISPOSAL CENTER
00337054	WASTE ASBESTOS	25	Y	179390	17-Dec-87	WASTE DISPOSAL CENTER
00337053	WASTE ASBESTOS	20	Y	179390	22-Dec-87	WASTE DISPOSAL CENTER
00337055	WASTE ASBESTOS	30	Y	179390	22-Dec-87	WASTE DISPOSAL CENTER
00337056	WASTE ASBESTOS	30	Y	179390	28-Dec-87	WASTE DISPOSAL CENTER
00337057	WASTE ASBESTOS	20	Y	179390	30-Dec-87	WASTE DISPOSAL CENTER
00448904	WASTE ASBESTOS	15	Y	179390	13-Oct-88	WASTE DISPOSAL CENTER
----	WASTE ASBESTOS	59	BA	179390	27-Jan-89	TRANSFERRED TO SHERWIN FOR DISPOSAL

= BAGS
= POUNDS
= CUBIC YARDS

POSAL FIRM:

TE DISPOSAL CENTER, INC.
. BOX 1095
TON, TX 78387
ID #TXD066447236

RMC08002600003911