

Shell Oil Company • Shell Chemical Company

A Division of Shell Oil Company



Deer Park Manufacturing Complex
P.O. Box 100
Deer Park, Texas 77536

July 5, 1983

PLAINTIFF'S EXHIBIT

SH-1721

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Texas Air Control Board
ATTN Mr. Cecil Bradford
6330 Highway 290 East
Austin, Texas 78723

Gentlemen:

ASBESTOS INSULATION REMOVAL

This letter is to give notice of our intent to remove asbestos materials over the next one-year period as required by 40 CFR Part 61.22(d) (3) (i) (A). This estimate covers small jobs as well as planned maintenance projects and unit demolition projects that may involve asbestos materials. If any other major job of demolition or renovation arises that is covered by Part 61.22(d), we will notify you in a letter specifically describing that job.

The following information is for your consideration:

(1) Name of Owner or Operator

Shell Oil Company, Deer Park Manufacturing Complex

(2) Address of Owner or Operator

One Shell Plaza, Houston, Texas 77002

LAM 017865

(3) Description of Facility Involving Asbestos

Shell Refinery and Chemical Plant will remove about 460,000 square feet of asbestos insulation and transite siding associated with maintenance shutdowns of certain production units. These units include the Aromatics Concentration Unit, Platformer No. 2, the Alkylation Unit, the Orthoxylene Unit, the Cat Feed Hydrotreater, the Catalytic Reforming Unit, and the Saturates Gas Plant. Several units will be dismantled entirely or in part during the next one-year period. These units include: the Ethyl Alcohol Plant, Platformer No. 1, the Paraxylene Unit, and Power Plant No. 1. Additional small quantities of asbestos insulation will be removed from the Resins Plant, the Olefins Plant, and the Light Oil Fractionation Unit.

DPMC-11558

(5) Scheduled Starting and Completion Dates

July 10, 1983, through July 9, 1984.

(6) Procedures to Be Followed

- (a) Shell personnel (or contractors under Shell supervision) will remove insulated piping as units or in sections in accordance with paragraph (d)(4)(iii) of the regulations. Asbestos materials exposed during cutting or disjointing or exposed to permit lowering of equipment to grade shall be wetted. Units, sections, or other parts will be lowered carefully to ground level to avoid air dispersion of asbestos fibers.
- (b) Shell will strip the asbestos insulation materials from removed piping by removing the weatherproof cover, immediately wetting the exposed asbestos material, and promptly removing the wetted asbestos material into heavy-weight plastic bags. Filled bags shall be tied tightly at the top, proper "Asbestos" warning labels affixed in accordance with regulations, and transported to an approved disposal site in a covered roll-off bin.
- (c) When sufficient asbestos-filled bags are accumulated, they will be transported by truck to Chemical Waste Management, Inc. at Port Arthur, Texas, for final disposal.
- (d) Shell will wet down transite sheets and cover with heavy-duty plastic for transport to disposal.

If you have any questions, please contact M. S. Waugh at (713) 476-7515.

Very truly yours,

Orig. Signed by W. H. Thompson

W. H. Thompson, Manager

bc: Mr. T. R. Williams, Manager
Environmental Conservation-
Operations - Head Office

LAM 017866

DPMC-11559

Texas Air Control Board

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bbc: R. R. Erickson
J. G. Massey
P. J. Snyder
R. H. Slaughter
J. T. Woods
ECB Satellite (2)
Env. Con. Chron (2)

MSW:oc

LAM 017867

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