SM-32-MC (REV. 4-79)

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Shell Oil Company • Shell Chemical Company
Interoffice Memorandum

PLAINTIFF'S EXHIBIT
SH-1702

JULY 23, 1985

FROM: K. A. SPAUNHORST, PROCESS ENGINEER - ENVIRONMENTAL CONSERVATION-REGULATORY AFFAIRS - HS&E - DPMC

TO: B. BITNER, TECHNICAL MANAGER - MAINTENANCE - OPERATIONS-EAST
J. S. McCRAY, TECH. MANAGER - MAINTENANCE - CHEMICAL OPER.
M. N. MARTIN, TECH. MANAGER - MAINTENANCE - LOG/ENVIRON/UTIL
N. L. NEWTON, TECH. MANAGER - MAINTENANCE - WEST/OLEFINS
W. W. REEVES, TECH. MANAGER - MAINTENANCE - LPA
T. A. ROBERTS, TECH. MANAGER - MAINTENANCE - CENTRAL

SUBJECT: ASBESTOS REMOVAL - CORRECTION

This is a correction to the note of July 15, 1985. DPMC Environmental Conservation Department has had further discussion with Head Office Environmental Conservation Department on the Recommendation (2) requesting DPMC to use NON-ASBESTOS labelled bags for disposing of non-asbestos insulation material. DPMC pledged to "do it right the first time" and keep our existing system by using unmarked disposal bags for non-asbestos materials and ASBESTOS-labelled bags for asbestos materials. Please review the problems and liabilities (incorrect disposal of a hazardous waste) of using incorrectly marked disposal bags for asbestos.

If you have any questions, call me at Ext. 7515.

Kay Spaunhorst

K. A. Spaunhorst

KAS:oc

cc: C. H. Rivers
P. A. Masta
ECB Satellite ← THIS COPY FOR
Env. Con. Chron (2)

LAM 017639

CHBS8519603

DPMC-11345

SM-32-MC (REV. 4-79)

Shell Oil Company • Shell Chemical Company
Interoffice Memorandum

JULY 15, 1985

FROM: K. A. SPAUNHORST, PROCESS ENGINEER - ENVIRONMENTAL CONSERVATION-REGULATORY AFFAIRS - HS&E - DPMC

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SUBJECT: ASBESTOS REMOVAL

The EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAP) requires written notification of our intentions to demolish or renovate asbestos materials.

I need an "estimate" of the amount (in square feet) of asbestos which will be removed and from what unit and during what time period (unit shutdown?) for all work done from July 10, 1985, to July 10, 1986. Please return your information to me by July 30, 1985.

As a reminder, in a recent Head Office Environmental regulatory audit, two recommendations were made:

(1) Mark off old plant dismantling operations and post CAUTION-ASBESTOS signs, and follow existing procedures for handling asbestos.

(2) Insulation in bags known not to contain asbestos should be labeled NON-ASBESTOS (this will reduce confusion in labeling and thus all insulation bags would be marked).

If you have any questions, call me at Ext. 7515.

Kay Spaunhorst

K. A. Spaunhorst

KAS:oc

cc: C. H. Rivers
P. A. Masta
ECB Satellite
Env. Con. Chron (2)

LAM 017640

CHBS8519603

DPMC-11346