

January 26, 1977

MANUFACTURING

Environmental Conservation
Department

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Regional Administrator, Region VI
U. S. Environmental Protection Agency
1600 Patterson Street, Suite 1100
Dallas, Texas 75201

Gentlemen:

This letter is to give notice of the start of demolition of a facility containing equipment and piping insulated with friable asbestos material as required CFR 40, Part 61.22(d). The following information is submitted:

(1) Name of owner or operator

Shell Oil Company

(2) Address of owner or operator

One Shell Plaza, Houston, Texas 77002

(3) Description of facility to be demolished

A water treating unit constructed in 1935. The facilities to be demolished have been idle for approximately five years, and consist of the following:

- (a) One vessel, Shell item number V-800, 19'0" diameter by 22'6" high, insulated.
- (b) One vessel, Shell item number V-801, 15'0" diameter by 18'7" high, insulated.
- (c) Approximately twelve concrete vessel supports and three structural steel pipe supports, uninsulated.
- (d) Approximately 1200 lineal feet of piping, none exceeding 20 inches nominal diameter.

The amount of friable asbestos material used for insulation is:

- (a) For vessels -- approximately 3000 square feet.
- (b) For piping -- approximately 200 lineal feet.

PLAINTIFF'S EXHIBIT

SH-1558

LAM 028900

ABS-017895

(4) Location of the facility to be demolished

Deer Park Manufacturing Complex, Deer Park, Texas

(5) Scheduled starting and completion dates

Starting date -- February 7, 1977
Completion date -- March 15, 1977

(6) Procedures to be employed

- (a) Insulated piping shall be removed 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 equipment shall be carefully lowered to ground level.
- (b) The friable asbestos insulation materials shall be stripped from removed piping by removing the weatherproof cover, immediately wetting the exposed asbestos material, and promptly removing the wetted asbestos material into fibreboard drums lined with heavy-weight plastic bags. Filled drums shall have plastic liner bags tied tightly at the top, lids installed, warning labels affixed in accordance with the regulations, and stored, adequately protected from weather, pending transportation to an approved disposal site or facility.
- (c) As sufficient asbestos wastes are accumulated, they will be transported by truck to Texas Ecologists, Inc. at Robstown, Texas, for final disposal.

If you have any questions concerning this matter, please contact C. H. Rivers, (713)-476-7667.

Very truly yours,

Original Signed by

R. E. Lopez

R. Lopez

Superintendent-Refinery

Deer Park Manufacturing Complex

CHR/HLL/rwh

bc: Head Office -- Manufacturing -- Environmental Conservation --
Manager -- Mr. R. E. Van Ingen ✓

LAM 028901

ABS-017896