PLAINTIFF'S EXHIBIT
UC-4445

UNION CARBIDE CHE
PLASTICS COMPANY INC.
SOLVENTS AND COATINGS MATERIALS DIVISION
P.O. BOX 471, TEXAS CITY, TEXAS 77592-047

Industrial Hygiene Department

December 14, 1992

Mr. James Prill
Galveston County Health District
Pollution Control Division
LaMarque, Texas 77568

Reference: Original Notification of Nonscheduled Renovations at Union Carbide Chemicals and Plastics, Inc., Texas City, Tx

Dear Mr. Prill:

Union Carbide Chemicals and Plastics Company, Inc. expects to engage in nonscheduled renovation activities from Jan 1-Dec 31, 1993. We estimate removing at least 1500 square feet and 1500 linear feet of regulated asbestos containing material (RACM) on pipes and other facility components. These estimated amounts are in accordance with the requirements of 40 CFR 61.145 (a)(4)(i)(ii).

Because the renovation operations are only predicted to occur, during the next twelve months, we cannot at this time advise you when each renovation will begin and be completed or how much asbestos will be removed during each renovation. However; we can advise you of the procedures we intend to employ in handling and disposing of the RACM. Any handling of RACM will be in the wet state and will conform to all the requirements of 40 CFR 61 (NESHAP) and 29 CFR 1910.1001 (OSHA). If the demolitions/renovations can be scheduled, the Texas Air Control Board (TACB) Form ACB-99b (3/1/91) will be completed.

Unless otherwise specified, all RACM will be disposed of at Gulf Coast Waste Disposal Authority, Loop 197, Texas City, Texas.

We believe this letter meets the requirements of 40 CFR 61.145, paragraphs (a)(4)(iii)(iv) and (b)(3)(ii), for nonscheduled renovation operations and proper notification. As with the case of scheduled demolition/renovation forms, I trust your office will submit a copy of the this letter to the appropriate Texas Air Control Board regional office. If you have any questions, please contact me at (409) 948-5589.

Sincerely,

Andrew F. Jackson, IHIT
Industrial Hygienist