



SHELL OIL COMPANY

P. O. BOX 100
DEER PARK, TEXAS 77536

02-DPM-WD

PLAINTIFF'S EXHIBIT

SH-1551

July 1, 1980

Subject: Asbestos Insulation Removal

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

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

T.R. Williams

Gentlemen:

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 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

(2) Address of Owner or Operator

One Shell Plaza, Houston, Texas 77002

(3) Description of Facility Involving Asbestos

Shell Refinery and Chemical Plant will remove about 40,000 square feet of asbestos insulation and transite siding associated with maintenance shutdowns of certain production units. These units include the butyl alcohol unit, the vinyl chloride unit, the BPA unit, the allyl chloride unit, the epichlorohydrin unit, the chlor-alkali plant, the distilling unit, the light olefins unit, the pyrolysis unit, the butylene fractionation unit, and the catalytic cracking unit.

(4) Location of the Facility

Deer Park Manufacturing Complex, Deer Park, Texas 77536

ABS-017881

LAM 028886

(5) Scheduled Starting and Completion Dates

July 20, 1980, through July 19, 1981

(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 disjoints 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 fibreboard drums lined with heavy-weight plastic bags. Filled drums shall have the plastic bags tied tightly at the top, lids installed, proper "Asbestos" warning labels affixed in accordance with regulations, and stored, pending transport to an approved disposal site.
- (c) When sufficient asbestos-filled drums are accumulated, they will be transported by truck to Texas Ecologists, Inc. at Robstown, Texas, or to Rollins Environmental Services at Deer Park, Texas, or to Chemical Waste Management, Inc. at Port Arthur, Texas, for final disposal.
- (d) Shell will wet down transite sheets and cover with a heavy-duty tarpaulin for transport to Rollins Environmental Services for disposal.

If you have any questions, please contact S. A. Weaver at (713) 476-7225.

Very truly yours,

Orig. Signed by J. M. Braus

J. M. Braus, General Manager
Deer Park Manufacturing Complex

bc: Head Office - Operations - Environmental
Conservation - Manager, Mr. T. R. Williams ←THIS COPY FOR

LAM 028887

ABS-017882