GEN 55 (REV.6/

Interoffice Memorandum

TO (Name and Location)	DATE
Mr. P. A. Turek	February 27, 1978
FROM (Name and Location)	REFERENCE NO.
J. M. Mullins	JMM-553-78

PLAINTIFF'S EXHIBIT

CEL-1064

Asbestos

The plant is required to report to the Environmental Protection Agency (EPA) each and every time insulation, etc., containing friable asbestos is removed from pipes, ducts, boilers, tanks, etc.. EPA requires notification of at least 10 days prior to commencement of demolition and as early as possible prior to commencement of renovation. In either case, we should comply with the advanced notification when possible and when necessary a late notification is acceptable.

Reference my attached letter JMM-397-76 dated July 7, 1976, describing highlights of the regulation. Current interpretation of the regulation requires EPA notification when friable asbestos of any quantity is removed.

I plan to use the information supplied by the Maintenance Department, Attachment I, to complete Attachment II and forward, by registered mail, to EPA. When friable asbestos material is removed in excess of the 260 feet or 160 square limitation described in the regulation, the plant is required to further describe the demolition/renovation operation to EPA.

When insulation of an unknown composition is removed, we will assume that asbestos is present and notify EPA as required.

Please direct questions concerning the regulation and/or the plant's requirement to my attention to insure compliance.

J. M. Mullins

Attachment
Copies to: Messrs: R. G. Brandt
J. M. League
R. W. James
E. C. Pulse
J. F. Roberson
R. T. Lemmons
M. R. Stenzel
C. E. Steel
W. H. Tuke
R. H. Maurer - CCCTC

File: E-10-A-4

010881

Attachment I

1. Amount of friable asbestos insulation removed:
   (Yards, feet or inches - width, length & thickness)

2. Starting Date:
   Completion Date:

3. Describe nature of renovation:

Completed by_____

Attachment II

1. Name of owner: Celanese Chemical Company, Inc.

2. Address of owner: 1211 Avenue of the Americas
New York, New York 10036

3. Amount of friable asbestos insulation:

4. Address of renovation: Pampa Plant
P. O. Box 937
Pampa, Texas 79065

5. Scheduled starting date:
Scheduled completion date:

6. Nature of renovation:

7. Disposal procedures: Procedures outlined in 40 CFR,61.22 (j)(1) & (2) will be employed.

8. Disposal site: Plant on-site asbestos disposal site.
Texas Solid Waste Registration

EN 33 REV. 1 (3-68)

INTERNAL LETTERHEAD

TO (NAME AND LOCATION)		REFERENCE NO.
Messrs: W. A. Morgan (5), R. G. Brandt		
FROM (NAME AND LOCATION)	REFERENCE NO.	DATE
J. M. Mullins	JMM-397-76	July 7, 1976

Copies to: Messrs: C. E. Steel, P. A. Turek, R. W. LaFon, H. A. Thomas, W. H. Tuke, L. E. Moore, J. F. Roberson, M. O. Wilson, W. W. Hampton, L. T. Johnston, R. H. Maurer - CCCTC

Asbestos Regulations

The Environmental Protection Agency amended national emission standards for the hazardous air pollutant asbestos in the Federal Register, Vol. 40, No. 199 - Tuesday, October 14, 1975. This amendment in conjunction with the regulations in the Federal Register, Vol. 38, No. 66 - Friday, April 6, 1973, restrict plant asbestos handling procedures as follows:

Demolition and Renovation

When friable asbestos insulation materials are stripped or removed from pipes, 260 feet, or from ducts, boilers, etc., 160 square feet, the Region VI Administrator must be notified in writing. The notice must be postmarked or delivered to the Administrator at least 10 days prior to commencement of demolition. The notice will include the facility name, address, structure description, starting and completion date, procedures used, and the quantity of asbestos removed. Demolition/renovation operations where less than 260 feet or 160 square feet of asbestos are removed are exempt from the notification requirement.

Suggested demolition site emission control procedures include:

1. The asbestos containing materials are to be removed before structure demolition occurs.

2. The asbestos containing materials are to be adequately wetted during stripping operations.

3. Asbestos containing materials shall not be dropped or thrown more than 50 feet to the ground. They will be transported to the ground using either dust-tight chutes or containers.

4. Local exhaust ventilation and/or dust collection systems can be used to remove asbestos from the work area.

5. Emissions resulting from cutting and/or drilling holes in asbestos containing material will be abated. Fresh air mask and protective clothing should be provided.

010884

Waste Disposal Sites

There are two classifications - active and inactive - disposal sites. An active site is one where additional asbestos containing waste materials may be deposited and the site may be disturbed by vehicular traffic. Warning signs and fencing are not required if a six inch cover of compacted non-asbestos-containing material is added daily, when asbestos is dumped, or a petroleum-based dust suppression agent is applied to control dust or wind errosion.

Pampa Operations

Handling and disposal operation require that all asbestos containing materials be wetted when stripped and deposited in leak-tight containers for landfilling. Fresh air mask, vacuum dust collection system, and coveralls will be provided to workers using power tools to cut or drill asbestos containing materials.

Responsibility Areas

Maintenance Manager

All insulation removed from existing facilities will be treated as if it contained asbestos. The plant does, however, purchase Kaylo and other insulation that is asbestos free. He will insure that all handling and landfilling operations are in compliance.

The Environmental Coordinator will be notified of demolition and/or stripping operation where asbestos containing materials are removed in excess of 260 feet from pipes or 160 square feet from ducts, boilers, tanks, etc.

Environmental Coordinator

The Coordinator will notify, by letter, the Environmental Protection Agency as required.

Definitions

Asbestos means actinolite, amosite, anthophyllite, chrysotile, crocidolite, or tremolite.

Friable asbestos materials means any material that contains more than one percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure.

Adequate wetted means sufficiently mixed or coated with water to prevent dust emissions.

J. M. Mullins

/mb