

SUN PETROLEUM PRODUCTS COMPANY

A Division of Sun Oil Company of Pennsylvania



October 10, 1980

*Cody's
here is your
copy for your
files.*

Mr. Bill Gill
Compliance Division
Texas Air Control Board
6330 Highway 290 East
Austin, Texas 78723



Dear Mr. Gill:

Please accept this letter as our instrument of notification of intent to remove friable asbestos as mandated by 40 CFR 61.22 paragraph d.

I have spoken with Tom Palmer about this job and he informed me that a letter of intent should be sent to your office. I also requested permission to start this job as soon as possible. Mr. Palmer gave an o.k. to this request.

JOB DESCRIPTION

OWNER OPERATOR - Sun Petroleum Products Company a Division of Sun Oil Company of Pennsylvania-Corpus Christi Refinery

MAILING ADDRESS - P.O. Box 2608
Corpus Christi, Texas 78403

PHYSICAL LOCATION - Off Interstate 37 at Suntide Road, 7 miles Northwest of Corpus Christi

JOB A

JOB DESCRIPTION - Demolition and removal of asbestos insulated deaerating vessels - BG652 and BG653 at the Boiler House unit. The material to be removed is blocked asbestos insulation. The towers are identical in size and shape being 22.5 feet from tangent to tangent and 12.5 feet in diameter. The caps are approximately conical in shape with diameters of 12.5 feet and heights of 3.75 and 7 feet. This represents approximately 1213.5 square feet of insulation per vessel for a total of 2427 square feet total insulation removal. This insulating material is 20 to 25 years old. These vessels were used as water deaerators until about 1978. At that time the vessels were removed from service and have been idle since that time. Some associated asbestos covered piping will be stripped and removed at the same time.

JOB DESCRIPTION
CONT

JOB B

Dismantle and remove asbestos blocked insulation from discarded catalytic cracking vessel DC 101. This vessel is approximately 65 feet from tangent to tangent with a 15 foot diameter. This represents surface area of approximately 2900 square feet (minus 160 square feet for manways and other openings.) In addition one section is asbestos covered on the inside. This section is approximately 20 feet by 15 foot diameter. This represents about 866 square feet of additional insulation. One cap is shaped like a truncated cone with the large diameter at 15 feet and the small diameter at 2.5 feet. The cone sides are angled at 30°. The area of this section is calculated to be about 260 square feet. Because the top section is very difficult to measure we estimate the area to be about 140 square feet. All together the total amount of insulation to be removed on this vessel is approximately 4166 square feet.

JOB A

JOB LOCATION

- Inside refinery limits of Sun Petroleum Products Company's Corpus Christi Refinery at Boiler House unit.

JOB B

Inside refinery limits of Sun Petroleum Products Company's Corpus Christi Refinery at scrap staging area.

START-FINISH DATE

- Start as soon as manpower becomes available we anticipate beginning about mid-October. Because this is not a priority job we would like to have our men work on the job when they are available. Therefore it is impossible to predict exact completion, but we anticipate completion before the end of the year.

REMOVAL METHOD

- Every effort will be made to restrict emission of fibers. Whenever we have to cut the insulation we will wet down the surface. All asbestos scraps and insulation will be bagged

JOB DESCRIPTION
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In impermeable plastic sacks. Some removal will take place in the Boiler House unit and the remainder will take place in a remote location near the flare stacks of the refinery. Sun Company employees will provide the manpower to do this job. All workers will be directed to exercise great care during all phases of this operation.

DISPOSAL SITE

- Arrangements have been made with Texas Ecologists, Inc. (a licensed disposal facility) of Robstown, Texas to handle disposal of the sacks of asbestos contaminated material.

REPLACEMENT MATERIAL-

No replacement is needed for these vessels. The old vessels have not been in service for several years and are being removed but not replaced.

If I can be of any further assistance please feel free to contact me at the address on the letterhead or by phone at (512) 241-4811, Ext. 271.

Sincerely,

Cody Milburn

Cody Milburn
Loss Control Supervisor

WCM/clw

cc: R. E. Fleming, J. R. Kampfenkel, J. D. Johnson, J. H. Alston

Tom Palmer
Texas Air Control Board
5602 Old Brownsville Rd.
Corpus Christi, Texas 78415

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