

SHELL CHEMICAL COMPANY

A DIVISION OF SHELL OIL COMPANY

P. O. BOX 2633

DEER PARK, TEXAS 77536

June 14, 1978

Subject: Removal of Asbestos
Insulation

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Regional Administrator, Region VI
U. S. Environmental Protection Agency
1201 Elm Street, First International Building
Dallas, Texas 75270

Gentlemen:

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

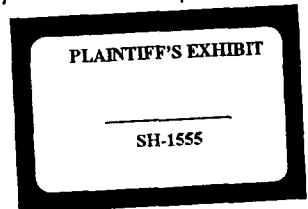
(3) Description of Facility to Be Demolished

A sulfur recovery unit was built in 1952. A second unit was constructed in 1966. These facilities, which have been idle for several years because of the construction of more modern recovery units, will be dismantled. Approximately 10,000 square feet of nominal two-inch thick pipe insulation will be removed by contract personnel under Shell supervision from lines ranging from 2 inches to 30 inches in diameter. Also, approximately 15,000 square feet of insulation will be removed from eleven pieces of process equipment such as columns, vessels, and furnaces. The smallest vessel is 3 feet in diameter and 15 feet high. The largest is 10 feet in diameter and 20 feet high.

(4) Location of the Facility to be Demolished

Deer Park Manufacturing Complex, Deer Park, Texas

MANUFACTURING			
Environmental Conservation Department RECEIVED			
JUN 16 1978			
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DUE DATE			
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(5) Scheduled Starting and Completion Dates

Starting Date: July 5, 1978

Completion Date: October 1, 1978

(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 other parts will be lowered carefully to ground level to avoid air scattering of asbestos material.
- (b) The asbestos insulation materials shall be stripped from removed piping by removing the weatherproof cover, immediately wetting the exposed asbestos material, and promptly removing this wetted asbestos material into fibreboard drums lined with heavy-weight plastic bags. Filled drums shall have the plastic liner bags tied tightly at the top, lids installed, warning labels affixed in accordance with regulations, and stored, adequately protected from the weather, pending transportation to an approved disposal site or facility.
- (c) When sufficient asbestos-filled drums are accumulated, they will be transported by truck to Rollins Disposal Service at Deer Park, Texas, for final disposal.

If there are any questions concerning this operation, please contact W. W. Wright, (713) 476-7248.

Very truly yours,

H. J. Bettencourt
Superintendent - Chemical
Deer Park Manufacturing Complex

bc: Head Office - Manufacturing -
Environmental Conservation -
Manager, Mr. A. G. Smith ~~THIS COPY FOR~~

LAM 028895

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