

**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-1072

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*  
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 - CCOTC

File: E-10-A-4

- 010973

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 \_\_\_\_\_

010974

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

-010975