

Interoffice Memorandum

PLAINIFF'S
EXHIBIT
CEL-869

TO (Name and Location) Mr. James Starks - ABI Superintendent	DATE August 28, 1986
FROM (Name and Location) Jaime Garza	REFERENCE NO. JG-033-86

Subject: Asbestos-Containing Insulation Removal

Under the National Emission Standards for Hazardous Air Pollutants (NESHAP's), notification is required to the Texas Air Control Board (TACB) when asbestos-containing insulation is removed from piping and other facility components. The U.S. Department of Labor, OSHA office, out of Corpus Christi, has requested that they also be notified (see attached letter).

The notification for asbestos-containing insulation (asbestos materials) removal requirements recognize a distinction between demolition and renovation. The reporting requirements are different. Celanese must always notify in advance with respect to demolition without regard to quantity. Celanese only notify with respect to renovation when we are in excess of the quantity limits as specified in 40 CFR Part 61.145 (d) and 40 CFR Part 61.145 (d)(1).

Demolition means "the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations." For demolition, we always have to notify, even if below the minimum quantities. Where more than 260 feet of pipe insulated with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed, notice to the TACB must be provided at least 10 days prior to commencement of the demolition. When the demolition involves friable asbestos below 260 feet of pipe or 160 square feet, written notice to the TACB must be provided at least 20 days prior to commencement of the demolition. In general, demolition work is not performed at Celanese on a routine basis.

Renovation means "altering in any way one or more facility components. Operations in which load-supporting structural members are wrecked or taken out are excluded." Facility component means "any pipe, duct, boiler, tank, reactor, turbine, or furnace at or in a facility; or any structural member of a facility."

There is a two-pronged approach to reporting/notifying in the case involving renovation work. Under 40 CFR Part 61.145 (d), if at least 260 feet of friable asbestos materials on pipes or at least 160 square feet of friable asbestos materials on other facility components are stripped or removed at a facility being renovated, notification must be made. This involves a single scheduled event. Timing for notification is "as early as possible before renovation begins." In the past we have always

009861

DO IT RIGHT THE FIRST TIME

Mr. James Starks
JG-033-86
Page 2

followed this procedure and have provided notification at least 10 days prior to commencement of the renovation work.

Under 40 CFR Part 61.145 (d)(1), operations involving individual non-scheduled operations, predict the additive amount of friable asbestos materials to be removed or stripped over the maximum period of time a prediction can be made, not to exceed one year. What this means is that written notification is required once for individual non-scheduled renovation operations where the additive amounts of asbestos materials removed or stripped exceeds the minimum amounts (260 feet of pipe/160 square feet) for one year.

I have talked to Mr. Ruben Pena and Mr. Wesley Baugh, both ABI employees, and have informed them of the above notification requirements. Since Mr. Pena is the insulator foreman, he informed me that he is aware of all insulation removal operations in the plant. We agreed that beginning September 1, 1986, Mr. Pena will maintain a log of all asbestos-containing insulation removal work performed at the plant and the amounts of asbestos materials removed. With this type of log, it will enable us to predict how much asbestos materials removal is performed over a year period. If the minimum amount of asbestos material removed is exceeded over a year period, than proper notification can be made. Furthermore, I have requested Mr. Pena to inform me directly whenever a single scheduled event of asbestos material removal is to be performed which will exceed the 260 feet on pipes or 160 square feet on other facility components.

If you have any questions, please contact me at extension 4450.


Jaime Garza

cc: R. G. Brandt
G. R. Llewellyn
C. R. DeRose
D. D. Siemonsma
W. H. Brough
F. L. Salinas
G. Ille
R. Pena - ABI
W. Baugh - ABI
P. A. Cerria - Chatham
G. M. Rowen - NYO
S.H.E. File: 231.2
WS Disc 2, ABIASBES

009862