DRAFT - 4/13/76

W.C.S. Has Final Letter 4/13/76



Mr. Paul D. Fahrenthold
Air Compliance Branch
Enforcement Division
Environmental Protection Agency
Region VI
1600 Patterson
Dallas, Texas 75201

Dear Mr. Fahrenthold:

In your letter to me dated March 16, 1976, you requested that we review asbestos-mercury revisions promulgated in the October 14, 1975 issue of the Federal Register, and state those revisions that affect our facility.

The only revision that affects our facility to the extent that we will need to make a change is --- (d) Renovation. There will probably be infrequent occasions when we will have to remove more than 160 square feet of friable asbestos used to insulate vessels. In such instances, we will provide written notification to the "Administration" as called for in the standard.

We dispose of removed asbestos but our procedures are in accord with the revised standard.

Form OMB No. 158-R0131 is attached in accordance with your request. Most of the information given on this form was furnished on Form OMB No. 158-R0098 in our letter to your office dated June 15, 1973. The only addition on R00131 regards disposal.

Very truly yours,

W. C. Strader
Resident Manager

Attach.

E-00582

ETC 14716

Paul S. Etc.

~~Ref. your letter of March 16, 1976.~~

In your letter dated March 16, 1976 ~~2nd Comment on~~ Asbestos - mercury

You requested that we review revisions promulgated in the Oct. 14, 1975 Federal Register and state those ~~revisions~~ that affect our facility.

~~The only revision that affects our facility to the extent that we will need to Remove that affect our facility.~~

Make change is - - - - -

(d) Renovation. — ~~more than 160 square feet of friable asbestos material used to insulate vessels.~~ There will probably be occasion ~~[illegible]~~ when we will have to remove more than 160 square feet of friable asbestos used to insulate vessels. In such instances we will provide written notification to the "Administrator" as called for in the standard.

We dispose of removed asbestos but our procedures are in accord with the ~~standard therefore~~ revised standard. ~~therefore no effect.~~

~~You also requested that we omit with~~

~~The~~

Form (OMB-R013) is attached in accordance with your request. Most of the information given on this form was furnished on form (OMB. 158-R0098) in our letter to your office dated June 15, 1973. The only addition on R013 regards disposal.

Very truly yours
W. C. S.

E-00584

ETC 14715