PLAINTIFF'S EXHIBIT
MON-2222

bcc: Central Files
Mr. F. C. Himes

Monsanto

MONSANTO CHEMICAL INTERMEDIATES CO.
P. O. Box 711
Alvin, Texas 77511
Phone: (713) 581-2161

July 8, 1977

Mr. John C. White
Regional Administrator
Environmental Protection Agency
Region VI
1600 Patterson Street, Suite 1100
Dallas, TX 75201

Dear Mr. White:

Re: National Emission Standard for Asbestos - 40 CFR 61 Subpart B

This is to report the planned generation of friable asbestos waste, the method of disposal and an estimate of generation amount for the next twelve months (7/77 - 7/78).

The information below follows the indicated paragraph of 61.22(d):

61.22(d)(2) (i) Monsanto Company

(ii) P. O. Box 711, Alvin, Texas 77511

(iii) It is estimated that operations at this location will generate about 40 cubic yards per month from stripping piping and equipment surfaces during the twelve month period 7/1/77 - 7/1/78.

(iv) Same as (ii).

(v) This is an estimate of renovation of the nature described in (iii) for the period 7/1/77 through 7/1/78.

(vi) Individual renovations of insulation on piping and equipment.

(vii) Insulation will be stripped to avoid visible emissions to the outside air, kept wet as needed to avoid dust emissions, bagged or drummed wet, and sealed in leak-tight containers while wet. Containers will be labeled per 61.22 (j)(3)(i)(1).

(viii) Disposal will be in our own location landfill where it will be disposed of according to paragraph 61.25 (e)(1).

If any further information is desired, or if the nature of our business does not require a report, please let me know.

Sincerely yours,

L. C. Peeler
Manufacturing Superintendent
Environmental Control

LCP:fm

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