

SUN PETROLEUM PRODUCTS COMPANY

A Division of Sun Oil Company of Pennsylvania 

PLAINTIFF'S
EXHIBIT
KRC-65

January 16, 1980

Mr. Charles Rubick
Compliance Division
Texas Air Control Board
6330 Highway 290 East
Austin, TX 78723

Dear Mr. Rubick,

Please accept this letter as the instrument of notification of intent to remove friable asbestos as mandated in 40CFR 61.22 paragraph d.

We are unable to give a 20 day prior notice of commencement due to the nature of our business and this particular job. Sun Petroleum Products Company's Corpus Christi Refinery is an oil refinery and petrochemical manufacturing plant. This particular job involves a vessel at one of our units which was taken out of service unexpectedly. If we cannot do the insulating job before 1-25-80, (the vessel has to be returned to service on 1-25-80) we will encounter additional problems with the operation of this unit.

I was referred to the Texas Air Control Board after talking to Mr. Larry Thomas of the Environmental Protection Agency in Dallas. I then spoke with Mr. Tom Palmer of the Texas Air Control Board, Corpus Christi office. Mr. Palmer told me there would be no problem with going ahead and removing the asbestos and sending the letter concurrently. In the future every attempt will be made to give you and your organization at least a 20 day prior notification of our intent to remove any large amounts of asbestos as described in 40 CFR 61.

Job Description

Owner operator	Sun Petroleum Products Company A Division of Sun Oil Company of Pennsylvania - Corpus Christi Refinery Contract assistance supplied by Gillman Insulation Company, Inc. of Corpus Christi, TX.
Mailing address	P.O. Box 2608 Corpus Christi, TX 78403
Physical location	Off Interstate 37 at Suntide Road 7 miles Northwest of Corpus Christi

Job description De-propanizer tower (D A 1705) at delayed Coker unit
The material to be removed is asbestos paste covering rock wool insulation. The tower is 2 1/2 feet in diameter and 50 1/2 feet tall from tangent to tangent. This works out to be approximately 400 square feet of material. This covering is approximately 20 years old. This vessel has been used as a de-propanizer since conception in 1960.

Job location Inside refinery limits of Sun Petroleum Products Company's Corpus Christi Refinery at Delayed Coking unit.

Start - Finish Date Start on or after 8:00 a.m. on 1-15-80, finish before 4:00 p.m. on 1-25-80

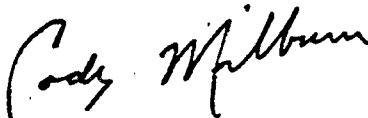
Removal method Every effort will be made to restrict emissions of asbestos fibers. First the sheet metal skin which covers the insulation will be carefully removed. Next the asbestos paste will be wet-down to reduce dry fiber emissions. The asbestos covered rock wool insulation will then be removed by sections. All asbestos contaminated material will be immediately sacked in impermeable plastic sacks. The workers will be directed to exercise great care during all phases of the operation.

Disposal site Arrangements have been made with Texas Ecologists, Inc. of Robstown, Texas to handle disposal of the sacks of asbestos laden material.

Replacement Material All replacement insulation will consist of non-asbestos containing materials.

If I can be of any further assistance please feel free to contact me at the address on the letterhead or by phone at (512) 241-4811 Ext. 271.

Sincerely,



Cody Milburn
Loss Control Supervisor

WCM/cs

cc: REF, JRK, JDJ, Tom Palmer

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