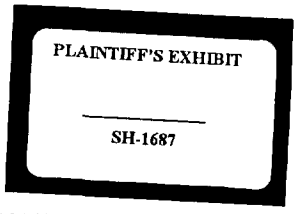
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INTEROFFICE MEMORANDUM



FEBRUARY 29, 1988

FROM: J. M. SOWLE - ENVIRONMENTAL ADVISOR - ENVIRONMENTAL REGULATORY AFFAIRS - HS&E - DEER PARK MANUFACTURING COMPLEX

TO: ALL OPERATIONS SUPERINTENDENTS
ALL FIELD TEAM MANAGERS
ALL TECHNICAL MANAGERS
P. A. MASTA
A. F. SCHMIT

SUBJECT: CLARIFICATION OF ASBESTOS REPORTING REQUIREMENTS

Recently, the asbestos removal work required at CR-3 and the LOFU has surfaced some questions regarding requirements for reporting to the Texas Air Control Board (TACB). The EPA has given the TACB the authority to check jobs for asbestos air pollution and assure proper disposal of removed material. Glenn Gibler and I visited the Texas Air Control Board (TACB) to understand the necessary reporting requirements.

The asbestos reporting requirements are stated in Federal regulations under the National Emissions Standards for Hazardous Air Pollutants (NESHAP's), 40 CFR 61, Subpart M. The regulations cover asbestos reporting for two basic kinds of asbestos work: demolition and renovation. Demolition involves the dismantling of a process unit or part of a unit. Renovation is any other work, which includes maintenance.

The timeliness of reporting asbestos insulation work to the TACB depends on the type of work performed and the quantity of asbestos removed. The chart below summarizes the requirements.

Type of Removal	Quantity Asbestos Removed	TACB Notification Requirement
Demolition	Greater than 160 square feet	10 days written prior to work starting (The annual report meets this requirement.)
Demolition	Less than 160 square feet (including zero)	20 days written prior to work starting (The annual report meets this requirement.)

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Type of Removal	Quantity Asbestos Removed	TACB Notification Requirement
Renovation (planned work)	Greater than 160 square feet	Written notice as soon as possible (The annual report meets this requirement.)
Renovation (emergency work)	Greater than 160 square feet	Call prior to starting work. Written follow-up soon as possible.

For us, in an emergency, no notification is required unless we are going to remove 160 or more square feet of asbestos insulation.

The first three categories of asbestos insulation removal reporting can be accomplished with our annual report which is submitted to the TACB each year in August. The report provides an estimate of asbestos removal for August 17 through August 16 of the following year. For the report, we state the expected amount of asbestos to be removed for all expected maintenance work and for demolition projects. The demolition projects are listed individually also.

To properly prepare the annual report, we (Environmental - Regulatory) need you to suppply us with your estimate of the expected quantity of asbestos insulation to be removed during planned maintenance work and demolition projects. The request for this information will be in July. For the report, it is important to list all demolition projects which may be done, even if no asbestos is expected to be removed. By submitting a complete annual report to the TACB, we can eliminate the need for any further reporting when we do the jobs which we included in the report.

If planned maintenance work or a demolition project arises which is not included in the annual report, the field must notify Environmental - Regulatory (Glenn Gibler, currently) at least one month prior to work being done. In this way, a report of the project to the TACB can be sent on time.

For emergency asbestos removal work over 160 square feet, the field needs to contact Glenn Gibler during days, or the Environmental Supervisor during other times, before work actually starts. A call will be placed to the TACB prior to work starting. Work should not begin until the field has received the approval to begin from Glenn or the Supervisor.

The TACB wants notification ahead of time to have an opportunity if they wish to visit the site during the removal of asbestos. The TACB has stated that they intend to inspect everyone annually who does asbestos

removal. When the TACB visits us, they will examine our removal procedures to see if the asbestos is properly wetted, and if any visible emissions are present. This is in contrast to OSHA, which is concerned with compliance with the exposure limit of 0.2 fibers/cc.

If you have any questions, please contact Glenn Gibler at 7515.

JMS

J. M. Sowle

cc: H. J. Bettencourt
S. C. Franke
T. E. Gillespie
J. L. Golden
E. G. Johnson
ECB Satellite
Envr. Chron. (2)

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