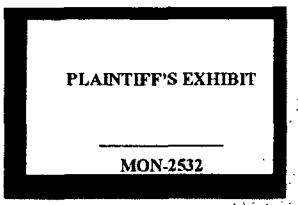
DCC: F. C. Himes
A. M. Keating - E3SG
G. Lunsford
P. S. Park - E2NE



PLAINTIFF'S EXHIBIT

MON-2532

AUG 2 1976

Monsanto

MONSANTO POLYMERS & PETROCHEMICALS CO.
P. O. Box 1311
Texas City, Texas 77590
Phone: (713) 945-4431

RBM has issued the enclosed directions for our opns

~~WWW~~/WVM - Please discuss with Keating any action required by Choc. Bayou. PCA 8/3 -

July 29, 1976

Mr. Paul Fahrenthold
U. S. Environmental Protection Agency
1600 Patterson Street
Dallas, Texas 75201

National Emission Standard for Asbestos-
40 CRF 61 Subpart B

Dear Paul:

This is the report which we discussed in a recent phone call. Included below for this location, is a brief description of the generation of friable asbestos waste, the method of disposal, and an estimate of generation for the next six months.

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

61.22 (d)(2)
(i) Monsanto Company
(ii) P. O. Box 1311, Texas City, Texas 77590
(iii) It is estimated that the individually non-scheduled operations will generate between 1.5 and 2.5 cubic yards from stripping piping and equipment surfaces during this six month period, August 1, 1976 - January 31, 1977.
(iv) Same as (ii).
(v) This is an estimate of renovation of the nature described in (iii) for the six month period August 1, 1976 thru January 31, 1977.
(vi) Individually non-scheduled renovations (repairs)
(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)(c).

C 003210

107

LAM022858

(viii) Disposal will be to the City of Texas City, Municipal Landfill, Loop 198, Texas City, Texas. It is our belief that this facility disposes of wastes in accordance with paragraph 61.25(e)(1).

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

Sincerely yours,

Ed Hendrick

E. R. Hendrick
Environmental Control
Specialist

ERH:mv

C 003211

LAM022859

BASIC
A BAKER OIL TOOLS COMPANY
BAKER AUTOMATION SYSTEMS
7130 HARWIN DR., HOUSTON, TEXAS 77036 • TEL. (713) 781-5600 • TELEX 762-734

SUPERVISORY CONTROL AND DATA ACQUISITION SYSTEMS — SAFETY SYSTEMS
APPLICATION • ENGINEERING • MANUFACTURING • INSTALLATION • SERVICE

Asbestos Insulation - (HMK phone conv.)

Action by Choc. Bayou:

RBM - Burns

(1) Forward to EPA a report similar to Hendrick's, if we contemplate a job large enough to come under the reporting requirement over next X months.

~~(2) Develop a comprehensive plant procedure~~

RBM
HMW
REBolden
JCEdwards

(2) Write a D-bulletin for future use (tentative until P.S. Park & EPA Lawyers decide what the rules mean.)

(3) Periodic reports, 1 or 2 per year. - per D bulletin.

8/13/76

106

C 003209

LAM022857