

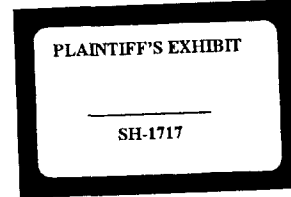


# SHELL OIL COMPANY

P. O. BOX 100  
DEER PARK, TEXAS 77536

July 1, 1980

Subject: Asbestos Insulation Removal



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CERTIFIED MAIL -  
RETURN RECEIPT REQUESTED

Texas Air Control Board  
Attn. Mr. Cecil Bradford  
6330 Highway 290 East  
Austin, Texas 78723

Gentlemen:

This letter is to give notice of our intent to remove asbestos materials over the next one-year period as required by 40 CFR, Part 61.22(d)(3)(i)(A). This estimate covers small jobs as well as planned maintenance projects that may involve asbestos materials. If any other major job of demolition or renovation arises that is covered by Part 61.22(d), we will notify you in a letter specifically describing that job.

The following information is for your consideration:

(1) Name of Owner or Operator

Shell Oil Company

(2) Address of Owner or Operator

One Shell Plaza, Houston, Texas 77002

(3) Description of Facility Involving Asbestos

Shell Refinery and Chemical Plant will remove about 40,000 square feet of asbestos insulation and transite siding associated with maintenance shutdowns of certain production units. These units include the butyl alcohol unit, the vinyl chloride unit, the BPA unit, the allyl chloride unit, the epichlorohydrin unit, the chlor-alkali plant, the distilling unit, the light olefins unit, the pyrolysis unit, the butylene fractionation unit, and the catalytic cracking unit.

(4) Location of the Facility

Deer Park Manufacturing Complex, Deer Park, Texas 77536

**LAM 017773**

DPMC-11471

(5) Scheduled Starting and Completion Dates

July 20, 1980, through July 19, 1981

(6) Procedures to Be Followed

- (a) Shell personnel (or contractors under Shell supervision) will remove insulated piping as units or in sections in accordance with paragraph (d)(4)(iii) of the regulations. Asbestos materials exposed during cutting or disjointsing or exposed to permit lowering of equipment to grade shall be wetted. Units, sections, or other parts will be lowered carefully to ground level to avoid air dispersion of asbestos fibers.
- (b) Shell will strip the asbestos insulation materials from removed piping by removing the weatherproof cover, immediately wetting the exposed asbestos material, and promptly removing the wetted asbestos material into fibreboard drums lined with heavy-weight plastic bags. Filled drums shall have the plastic bags tied tightly at the top, lids installed, proper "Asbestos" warning labels affixed in accordance with regulations, and stored, pending transport to an approved disposal site.
- (c) When sufficient asbestos-filled drums are accumulated, they will be transported by truck to Texas Ecologists, Inc. at Robstown, Texas, or to Rollins Environmental Services at Deer Park, Texas, or to Chemical Waste Management, Inc. at Port Arthur, Texas, for final disposal.
- (d) Shell will wet down transite sheets and cover with a heavy-duty tarpaulin for transport to Rollins Environmental Services for disposal.

If you have any questions, please contact S. A. Weaver at (713) 476-7225.

Very truly yours,

Orig. Signed by J. M. Braus

J. M. Braus, General Manager  
Deer Park Manufacturing Complex

SAW:oc

bc: Head Office - Operations - Environmental  
Conservation - Manager, Mr. T. R. Williams

**LAM 017774**

bbc: D. O. Chrismer  
R. P. Frutiger  
J. G. Massey  
R. V. Mattern/C. H. Rivers/J. W. Ivie  
D. S. Meaden

P. J. Snyder  
R. H. Slaughter  
R. J. Swofford  
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DPMC-11472