PLAINTIFF'S EXHIBIT
tabbies
CEL-464

CELANESE
CHEMICAL COMPANY

CHEMCEL PLANT

December 15, 1977
PEH-23-77

Ms. Adeline Harrison
Administrator, Region VI
Environmental Protection Agency
First International Bank Building
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Harrison:

We have a continuing project here of renovating old processing areas. Part of the project includes the removal of friable asbestos-containing insulation from lines and vessels, and disposing of the insulation in an on-site solid waste disposal site. This project will re-commence after January 1, 1978, and end prior to December 31, 1978.

This letter will serve as a ten-day notification of the renovation, as required by Section 61.22 (d) (2) of CFR Part 61, Subpart A. The attached sheet shows the required information. Please contact me if you have any questions or comments.

Very truly yours,

Paul E. Hime
Plant Manager

kf

cc: Messrs. W. T. McNair
J. M. Sawyer
bcc: Messrs. H. W. Head, Jr.
R. H. Maurer
M. A. John
C. E. Boswell
J. C. Susil
P. J. Volpe

001396

ATTACHMENT I

Notification Information - Planned Renovation

I. Owner: Celanese Corporation

II. Address: 1211 Avenue of the Americas
New York, New York 10036

III. Description: Renovate old processing area which includes removal of lines and vessels insulated with friable asbestos - containing insulation. No buildings or structures will be demolished.

IV. Address of Site: Chemcel Plant
Celanese Chemical Company
P. O. Box 428
Bishop, Texas 78343

V. Starting date: January 1, 1978
Completion date: December 31, 1978

VI. Nature of renovation:
See III above.

VII. Procedures:

a. Friable asbestos - containing insulation will be wetted throroughly prior to stripping from piping and/or vessels.

b. No insulation or insulated lines will be dropped or thrown to ground level.

c. These containers shall be land-filled in the appropriate, registered landfill site.

VIII. Landfill Site: On-site land-fill, Chemcel Plant, Bishop, Texas
(Texas Water Quality Board Registration #30084)

IX. Volume of asbestos - containing insulation removed:

From lines: Approximately 2,000 lin. ft.

From vessels: Approximately 5,000 sq. ft.