

SOUTHWESTERN REFINING COMPANY, INC.

CORPUS CHRISTI, TEXAS 78408

PLAINTIFF'S EXHIBIT

KRC-506

February 2, 1988

Bill Stewart, P.E.
Executive Director, TACB
6330 Highway 290 East
Austin, Texas 78723

Dear Mr. Stewart:

Please acknowledge this letter and enclosed proposal as being in compliance with 40 CFR 61-145/146 Standard for removal and disposition of asbestos material.

Thorpe Insulation Company has been chosen to perform this job for us and enclosed is a copy of their detailed procedure.

Should there be any questions, please call.

Sincerely,

Southwestern Refining Co. Inc.

V. Waylon Litton

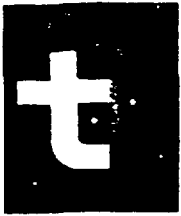
V. Waylon Litton
Manager, Safety/Hygiene

/fmn

cc: W. T. Palmer, P.E.
Regional Director
5602 Old Brownsville Rd.
Corpus Christi, Texas 78415

SWRf/Asbestos 6240

1H 041604



THORPE INSULATION COMPANY

DISTRIBUTORS AND CONTRACTORS OF INDUSTRIAL INSULATION

January 28, 1988

Texas Air Control Board
5602 Old Brownsville Road
Corpus Christi, Texas 78415

Attention: Ms. Debbie Stine

Subject: ASBESTOS INSULATION REMOVAL PROCEDURES
Southwestern Refining Company
Corpus Christi, Texas

Please be notified of our intent to perform asbestos removal at the above subject project, pursuant to Title 40 Code Federal Regulations 61.146.

We are familiar with the latest OSHA and EPA Regulations and Standards for asbestos removal and we take all the necessary steps required to perform this type of work.

In accordance with the above regulations, please see the Notification Requirements outlined herein:

- a.) The owner of this facility is Kerr-McGee Corporation - 1700 Nueces Bay Boulevard - Corpus Christi, Texas.
- b.) The materials containing asbestos shall be removed from two exchangers and various piping. The facility is approximately 34 years old.
- c.) The approximate amount of friable asbestos material to be removed is 20 cubic yards.
- d.) The location of the facility is 1700 Nueces Bay Boulevard - Corpus Christi, Texas.

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e.) The asbestos removal on the above subject project will commence on or about February 20, 1988 and the completion date shall be on or about March 15, 1988.

f.) In addition to our own established company asbestos removal procedures, we will also be following applicable Federal Regulations 29CFR1910.1001 - ASBESTOS STANDARDS; 29CFR1910.134 - RESPIRATORY PROTECTION; 40CFR61 SUBPART A and 40CFR61 SUBPART M.

g.) The work area shall be enclosed with a layer of 6 mil clear plastic stretched over a scaffold frame work. We will be using a HEPA Air Filtration to create a negative pressure within the work enclosure. We shall also use glove bags. Please see the attached instruction sheet for our method of removal. The HEPA Vacuum shall be used to maintain a negative pressure within the glove bag. Additionally we shall use the HEPA Vacuum for clean up along with our standard clean up procedures.

The area and materials shall be sprayed with water containing a wetting agent. While materials being removed are still wet, they will be placed in properly labeled 6 mil plastic bags.

Our employees shall also wear an approved Type C Fresh Air Mask and disposable hoods, boot covers, gloves and coveralls during this work. They will be required to shower before lunch and before leaving the jobsite. During the jobs progress, personal and environmental samplings shall be performed.

h.) The bags of friable asbestos waste materials shall be disposed of at Waste Disposal, Inc. - P. O. Box 1095 - Sinton, Texas.

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We hope this will provide you with a thorough explanation of our Asbestos Removal Procedures. If you should need any additional information, please do not hesitate to contact us.

THORPE INSULATION COMPANY

A handwritten signature in cursive script that reads "W. R. Moake".

W. R. Moake
Vice President

WRM:sgs

copy: Southwestern Refining
Thorpe Corporation

SWRf/Asbestos 6243

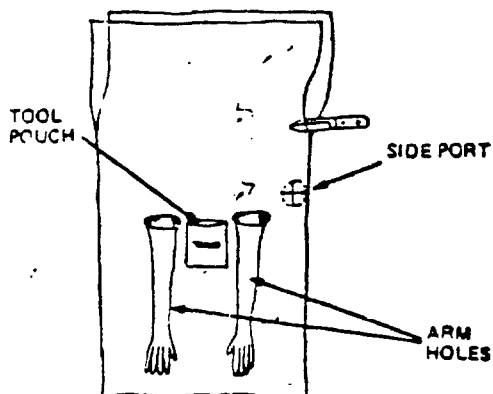
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INSTRUCTIONS FOR THE PROFO-BAG

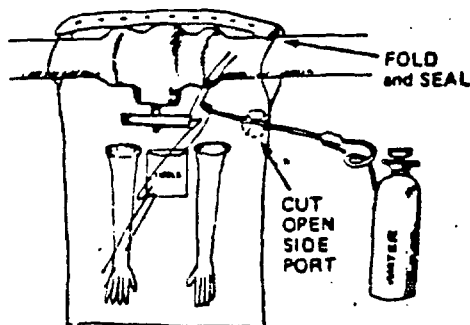
A special purpose 7 mil clear poly bag (44 x 63 standard size) printed with black caution signs and utilizing attached Dupont Tyvek® arms with latex gloves. Special sizes can be ordered.

These are general instructions for the use of the Profo-Bag and it may be necessary to modify them in some manner to fit the needs of your specific use or project; i.e. the shape, location, temperature, space allowances, etc.

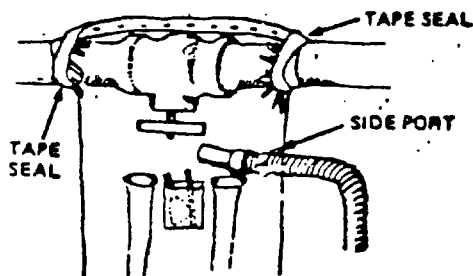
STEP 1: Cut the sides of the Profo-Bag to fit the size pipe you will be working on, and insert the tools you will need into the attached tool pocket.



STEP 2: Attach the Profo-Bag to the working area by sliding the open edges together and sealing with staples and tape. (Remember this sealed area will be supporting the weight of the debris, additional support may be necessary.)

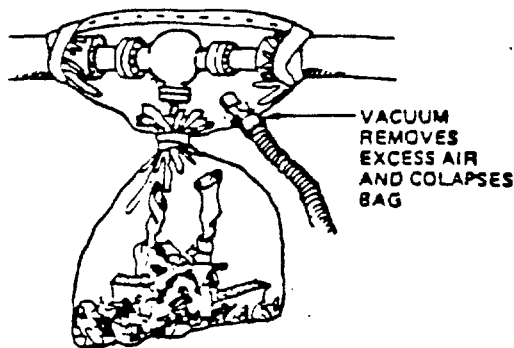


STEP 3: Seal the edges of the Profo-Bag around the working area with tape to form a tight seal. Slice open the side port to allow entry of the wetting tube and HEPA-VAC hose. Insert the nozzle from your portable sprayer and thoroughly wet the area to be removed. You may then insert the HEPA-VAC hose into the side port and seal around it with tape.



STEP 4: Insert your arms into the armholes and gloves and proceed to remove the asbestos from the valve fitting and pipe. When the job has been completed turn on the HEPA-VAC to remove air from the bag.

STEP 5: With the air being removed from the Profo-Bag, Squeeze the bag tightly (as close to the top as possible) and twist seal and tape closed to keep the asbestos material safely at the bottom of the bag. Turn off the HEPA-VAC and remove the hose from the side port, taking care to seal the side port with staples and tape.



STEP 6: You may now cut and remove the Profo-Bag from the working area and place it into another plastic bag and dispose of it properly.

STEP 7: You may now proceed to HEPA-VAC your work area for any residual materials and seal the exposed edges with the proper sealants.

NOTE: The reference to the use of a HEPA-VAC indicates that the vacuum you use should have a filter efficiency of 99.95 at .3 microns or better.

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1H 041608

NON-WARRANTY: Since it is impossible for the manufacturer to know the wide variety of conditions under which this product may be used, the seller makes no warranty of any kind, express or implied concerning the use of this product. The buyer assumes all risks of use or handling whether in accordance with directions or not.

ORDER ADDITIONAL
SUPPLIES FROM



ASBESTOS CONTROL TECHNOLOGY, INC.