



Paul E. Hime
Plant Manager
Chemcel Plant

REGISTERED MAIL
RETURN RECEIPT REQUESTED

March 23, 1978
PEH-42-78

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

Dear Ms. Harrison:

On this date, it was necessary to make a tie-in on a line which was insulated with asbestos. Asbestos insulation was removed from about 3 feet of a 10-inch line and from a 10-inch valve. The asbestos was wetted, stripped from the line, placed in plastic bags, and was landfilled in our asbestos disposal site.

It was necessary to make this tie-in today to alleviate a serious steam pressure imbalance in the Plant. This severe imbalance was brought about by this week's hot weather. The Plant steam imbalance threatened the operation of one of our major operating units, which, if shutdown instantaneously, could jeopardize the operation of all Plant Site operating units. Therefore, it was felt that this tie-in was urgent. We did not know that this was asbestos insulation until we got into the job and we notified you as soon as possible.

This letter will serve as notification of this work, as required by 40 CFR. 61.22 (d) (2). The attached data sheet lists all pertinent data.

Please contact me if you have any questions or comments.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'P. E. Hime'.
P. E. Hime
Plant Manager

bgh
Attachment

002251

Ms. Adeline Harrison
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bcc: Mssrs. R. H. Maurer
H. W. Head, Jr.
M. A. John
C. W. Harrison
P. J. Volpe
Jaime Garza
Central Files (2)

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Notification Information - Pipe Tie-In

- I. Owner: Celanese Chemical Company, Inc.
- II. Address: 1211 Avenue of the Americas
New York, New York 10036
- III. Description: Tie into a 10 inch pipe necessitating the removal of friable asbestos insulation, make the tie-in, and reinsulate with non-asbestos insulation.
- IV. Address of Site: Chemcel Plant
Celanese Chemical Company, Inc.
P. O. Box 428
Bishop, Texas 78343
- V. Starting and completion date: March 23, 1978
- VI. Nature of Tie-in: See III, above.
- VII. Procedures: Wet insulation thoroughly, strip off insulation, pack in plastic bag, and landfill in registered (on-site) landfill.
- VIII. Landfill Site: Texas Department of Water Resources
Registration #30084
- IX Volume of Friable-Asbestos Insulation: 3 feet from a 10-inch line 10-inch valve insulation from one valve.

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