THIS COPY FOR: MR. C. L. GREEN - ROCKDALE

1985 July 24

Mr. W. T. Palmer, P.E.
Regional Director
Texas Air Control Board
5602 Old Brownsville Road
Corpus Christi, TX 78415

CERTIFIED MAIL
Return Receipt Requested

Re: NESHAP Notification

Dear Mr. Palmer:

The Aluminum Company of America, Point Comfort Operations, located at Point Comfort, Texas provides the following notification in compliance with U. S. Environmental Protection Agency regulations CFR 40, Part 61, Subpart M as part of the National Emission Standards for Hazardous Air Pollutants for asbestos.

During the remainder of 1985 and projected through 1988, Alcoa's Point Comfort Operations plans to replace up to 10,000 square feet of insulation materials per year.

The insulation material has been examined and we have determined that certain sections contain asbestos and other sections are free of asbestos materials. Approximately 5% of the insulation identified for replacement contains asbestos.

The insulating materials are located on various parts of process equipment (vessels and pipes) associated with our bauxite refining operations at Point Comfort.

The renovation is scheduled along with other normal maintenance activities for the remainder of 1985 and is expected to continue at least through 1988.

85-07-29
Detailed handling procedures have been developed for use by the personnel involved in the renovation activity. The insulation materials will be wetted to control particulate generation, placed in heavy-duty plastic bags and sealed. Only asbestos will be so handled. Bags will be deposited in special containers for transport to the on-site facility designated for asbestos landfill disposal as described on the Texas Department of Water Resources solid waste registration No. 30035. Coverage of the insulation materials at the landfill site with soil will be completed by the end of each work day.



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Since the nature of the renovation project will be an on-going activity, and most individual jobs are quite small, we suggest that this notice would be adequate for the remainder of 1985 and we would plan to update the notification at the first of 1986 and later dates as conditions warrant.

If you have any questions, or require additional information, please contact the writer at (512) 987-2631, extension 2427.

Sincerely,

John C. Mayfield
Environmental Control Superintendent
Point Comfort Operations

JCM/dw

bcc: Mr. R. D. Fitzgibbon, Point Comfort
Mr. J. Quaglia, Point Comfort
Mr. C. L. Green, Rockdale
Staff File