

MON-1843

XC Tim Bonner
 Dick Louvet
 Presley Sharp
 Hoyt Clark / Mike Grey

DATE: December 5, 1984

TO: Galveston County Board of Health

FROM: Jackie W. Ickes

FYI - this is very similar to
 what EPA did to our Pensacola
 plant. If construction doesn't
 comply we get the violations.

orig - JCEdwards 1/8

SUMMARY OF EVENTS
 UNION CARBIDE CORPORATION # 2 POWERHOUSE
 KIMMINS CORPORATION, MAIN CONTRACTOR

June 12, 1984 - Texas Air Control Board (TACB), Region 5, Houston received a Notification Letter concerning demolition concerning #2 Powerhouse and the Ethyleneamines facilities (hereafter referred to as #2 Powerhouse) within the Union Carbide main plant in Texas City. TACB, Region 7 forwarded the notification to the Galveston County Health District Air Control Division, which is contractually obligated to enforce the National Emission Standard for Hazardous Air Pollutants (NESHAP) within Galveston county.

Approximately June 20, 1984 - In a predemolition inspection of Union Carbide's # 2 Powerhouse, Union Carbide and Kimmins Corporation representatives present described activities to take place. From the conversation no problems were anticipated.

July 9, 1984 - Galveston County Health District, Air Control Division received the complaint #84-149.

July 10, 1984 - I inspected demolition site as part of investigation of complaint #84-149. I found sub-standard work 1) inadequately wetted/exposed friable asbestos insulation and, 2) bagged friable asbestos in uncontrolled area.

July 12, 1984 - Re-inspected #2 Powerhouse. Major areas of concern had been corrected. Exposed pipe ends covered (with one (1) exception). Bagged asbestos had been segregated from work area.

July 13, 1984 - I issued NOV's to Union Carbide Corporation and Kimmins Corporation for problems of July 10, to document problems in case future problems arose.

July 25, 1984 - Galveston County Health District-Air Control Division received replies to NOV's of July 13, 1984 from Union Carbide Corporation and Kimmins Corporation. Both acknowledged potential problems in the storage of bags containing asbestos, but both avoided the problem area concerning inadequately wetted/exposed asbestos. Union Carbide requested rescinding all NOV's.

*But
 FYI + Return
 JWS*

C 000057

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October 22, 1984 - Galveston County Health District-Air Control Division received from TACB-Austin a copy of demolition notification letter for Union Carbide's Butadiene facility.

Approximately October 23, 1984 - A phone conversation with Union Carbide's Jack Erdmann concerning Butadiene facility. Set up preinspection for November 12, 1984 (job had been delayed), discovered #2 Powerhouse demolition still underway, I set up inspection for the week of October 29, 1984.

October 30, 1984 - I inspected #2 Powerhouse demolition site. Found sub-standard work. Four (4) areas were commented on for needed improvement.

- 1) Lack of Bags for asbestos insulation.
- 2) Asbestos insulation laying on ground.
- 3) Excessive stockpiling of bagged asbestos insulation.
- 4) Protective equipment on workers not being utilized.

Note that pipe mentioned in inspection July 12, 1984 in same condition as that date. I sampled exposed insulation from vessel and indicated to Union Carbide's Jack Erdmann and Kimmins, Tony Miller that I would contact EPA, Region 6 in Dallas for assistance with this demolition. Also stated negotiations was the preferred method of solving problems at this site instead of formal enforcement actions. Contacted EPA, Region 6 concerning assistance with the problems at Union Carbide's #2 Powerhouse and was referred to TACB. Contacted Steve Pierce at TACB, Region 7 about joint inspection November 5, 1984.

November 5, 1984 - Joint inspection Galveston County Health District-Air Control Division and Texas Air Control Board, Region 7 of # 2 Powerhouse found job site in slightly better condition than on October 30, 1984. Exposed asbestos insulation as noted in above inspections dated July 12, and October 30, 1984. Found the insulation to be inadequately wetted when samples was taken. Requested information on modification of notification. NOV's were issued by Galveston County Health District-Air Control Division for 1) demolition without proper notification and 2) inadequately wetted/exposed friable asbestos.

November 12, 1984 - Inspection of #2 Powerhouse and preinspection of Butadiene facility. Preinspection of Butadiene unit went well. Saw work to be done and discussed procedures and what was expected. Went to # 2 Powerhouse. Found 5 foot section 3/4" pipe with inadequately wetted/exposed asbestos insulation. Took two (2) samples. Union Carbide representative, Jack Erdmann crushed a piece of insulation in my presence creating a "Minor" dust emission. I was told that the notification problem was "was being taken care of by Kimmins Corporation." I issued two (2) NOV's for 1) demolition without proper notification and, 2) inadequately wetted/exposed friable asbestos.

November 13, 1984 - Postmark for Kimmins Corporation modification of notification letter was one (1) day after second NOV was mailed.

November 15, 1984 - Galveston County Health District-Air Control Division received letter postmarked November 13, 1984.

December 3, 1984 - Inspection of #2 Powerhouse and Butadiene unit inspected by myself, Jackie W. Ickes and Dr. E. R. Ibert, both of Galveston County Health District and representatives of Union Carbide Corporation; John Leverton, Jack Erdmann, Peri Yalcinkaya, and Kirk Martin. At # 2 Powerhouse total of seven (7) or eight (8) pipe ends with exposed insulation. Sampled one (1) 3/4" pipe end which was inadequately wetted, split sample with Union Carbide. Group proceeded to Butadiene unit where demolition was in progress. All activities witnessed in compliance. Spoke to Mr. Leverton and told him my plan of action, which is as follows:

- 1) NOV for exposed inadequately wet friable asbestos in # 2 Powerhouse.
- 2) Report of problems to Galveston County Board of Health, December 5, 1984.
- 3) Any further violation would result in request by Galveston County Health District-Air Control Division to file suite.

Jackie W. Ickes
Jackie W. Ickes
Air Control Division
Galveston County Health District

John Leverton Safety Director UUC