



SHELL OIL COMPANY

P. O. BOX 100
DEER PARK, TEXAS 77536

June 26, 1978

Subject: Asbestos Insulation Removal 13 1978

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Regional Administrator, Region VI
U. S. Environmental Protection Agency
1201 Elm Street, First International Building
Dallas, Texas 75270

Gentlemen:

This letter is to give notice of our intent to remove asbestos materials over the next one-year period as required by 40 CFR, Part 61.22(d)(3)(i)(A). This estimate covers small jobs as well as planned maintenance projects that may involve asbestos materials. If any other major job of demolition or renovation arises that is covered by Part 61.22(d), we will notify you in a letter specifically describing that job.

The following information is for your consideration:

- (1) Name of Owner or Operator

Shell Oil Company

- (2) Address of Owner or Operator

One Shell Plaza, Houston, Texas 77002

- (3) Description of Facility Involving Asbestos

Shell Refinery and Chemical Plant will remove about 50,000 square feet of asbestos insulation and transite siding associated with maintenance shutdowns of certain production units. These units include the butyl alcohol unit, the ethyl chloride/allyl chloride unit, the epichlorohydrin unit, the chlor-alkali plant, the ethylene plant and boilers, the resins units, the hydrocracker, the distilling unit, and the Dubbs unit.

- (4) Location of the Facility

Deer Park Manufacturing Complex, Deer Park, Texas 77536

MANUFACTURING
Environmental Conservation
Department
RECEIVED

Relocation Removal # 1978

ROUTING	FILE	INFO
<i>[Signature]</i>	<i>[Signature]</i>	
<i>[Signature]</i>		
DUE DATE		
FILE	M F 9.4.1-1	

PLAINTIFF'S EXHIBIT

SH-1554

LAM 028892

ABS-017887

(5) Scheduled Starting and Completion Dates

July 20, 1978, through July 19, 1979

(6) Procedures to Be Followed

- (a) Shell personnel (or contractors under Shell supervision) will remove insulated piping as units or in sections in accordance with paragraph (d)(4)(iii) of the regulations. Asbestos materials exposed during cutting or disjointing or exposed to permit lowering of equipment to grade shall be wetted. Units, sections, or other parts will be lowered carefully to ground level to avoid air dispersion of asbestos fibers.
- (b) Shell will strip the asbestos insulation materials from removed piping by removing the weatherproof cover, immediately wetting the exposed asbestos material, and promptly removing the wetted asbestos material into fibreboard drums lined with heavy-weight plastic bags. Filled drums shall have the plastic bags tied tightly at the top, lids installed, proper "Asbestos" warning labels affixed in accordance with regulations, and stored, pending transport to an approved disposal site.
- (c) When sufficient asbestos-filled drums are accumulated, they will be transported by truck to Rollins Environmental Services at Deer Park, Texas, for final disposal.
- (d) Shell will wet down transite sheets and cover with a heavy duty tarpaulin for transport to Rollins Environmental Services for disposal.

If you have any questions, please contact
W. W. Wright at (713) 476-7248.

Very truly yours,

Original Signed by R. G. Dillard

R. G. Dillard, General Manager
Deer Park Manufacturing Complex

cc: Head Office - Manufacturing -
Environmental Conservation -
Manager, Mr. A. G. Smith ←THIS COPY FOR←

LAM 028893

ABS-017888