

*FILE*

SOUTHWESTERN REFINING COMPANY, INC.

CORPUS CHRISTI, TEXAS 78408

PLAINTIFF'S EXHIBIT

KRC-510

February 5, 1986

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

Dear Mr. Stewart:

My letter to you, dated May 31, 1985, stated that Southwestern Refining Co. Inc. did not anticipate any removal of asbestos for the year 1986. This has changed; whereby, please acknowledge this letter and enclosed proposal as being in compliance with 40 CFR 61-145/146 Standard for Demolition and Renovation 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.

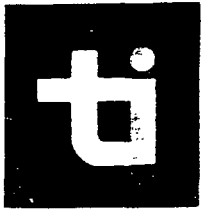
*V. Waylon Litton*  
V. Waylon Litton  
Manager of Safety/Hygiene

am

cc/enc: W. T. Palmer, P.E.  
Regional Director  
A.L. Cock, Region 5  
5602 Old Brownsville Road  
Corpus Christi, Texas 78415

SWRF/Asbestos 6439

1H 041799



# THORPE INSULATION COMPANY

DISTRICT FIELD CONTRACTORS OF INDUSTRIAL INSULATION

February 3, 1986

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

Attention: Ms. Debbie Stine

Subject: ASBESTOS INSULATION REMOVAL PROCEDURES  
Southwestern Refining Company  
Cat Cracker Unit  
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 below:

- A.) The owner of the facility is Kerr-McGee Corporation - 1700 Nueces Bay Boulevard - Corpus Christi, Texas.
- B.) The materials containing asbestos shall be removed from the reactor and stripper and reactor skirt (outside only) on the Cat Cracker Unit. The Cat Cracker is approximately 9.5'Ø x 30'.
- The facility is approximately 32 years old.
- C.) The approximate amount of friable asbestos material present is 34 cubic yards.
- D.) The location of the facility is Cat Cracker Unit at Southwestern Refining Company - 1700 Nueces Bay Boulevard - Corpus Christi, Texas.
- E.) The asbestos removal on the above subject project shall commence on or about February 21, 1986 and the completion date shall be on or about February 23, 1986.

SWRf/Asbestos 6440

1H 041800

February 3, 1986

Page -2-

F.) In addition to our own established company asbestos removal procedures, we shall 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. Additionally, we shall use the HEPA Vacuum for clean up along with our standard cleanup 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.

We hope this will provide you with a thorough explanation of our Asbestos Removal Procedures than previously submitted.

SWR/Asbestos 6441

1H 041801

February 3, 1986  
Page -3-

If you should have any questions, please do not hesitate to contact us.

THORPE INSULATION COMPANY

*W. R. Moake*

W. R. Moake  
Vice President/Operations Manager

WRM:sgs

cc: file

copy: Kerr-McGee Corporation  
1700 Nueces Bay Boulevard  
Corpus Christi, Texas 78407  
Attention: Mr. Waylon Litton

J. T. Thorpe Company  
P. O. Box 33399  
Houston, Texas 77233  
Attention: Mr. Gregg Roberts

SWRT/Asbestos 6442

1H 041802

SOUTHWESTERN REFINING COMPANY, INC.

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CORPUS CHRISTI, TEXAS 78408

May 31, 1985

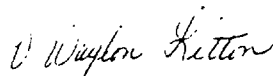
Bill Stewart, P.E.  
Executive Director, TACB  
6330 Highway 290 East  
Austin, Texas 78723

Dear Mr. Stewart:

To comply with TACB regulations, Southwestern Refining Co., Inc. will continue to follow the 40 CFR 61-145 Standard for Demolition and Renovation of asbestos material.

We do not anticipate any removal of asbestos for the remainder of this year 1985 or 1986. Should any future plans fall within the standard guidelines, we will inform your office and the local office here in Corpus Christi.

Sincerely,



V. Waylon Litton  
Manager of Safety

am  
xc: W. T. Palmer, P.E.  
Regional Director  
A. L. Cock  
Region 5  
5602 Old Brownsville Road  
Corpus Christi, Texas 78415  
bxc: Burnell Brown-FYI

SWRt/Asbestos 6443

1H 041803

# TEXAS AIR CONTROL BOARD

6330 HWY. 290 EAST  
AUSTIN, TEXAS 78723  
512/451-5711

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OTTO R. KUNZE, Ph. D., P. E.  
R. HAL MOORMAN  
HUBERT OXFORD, III

March 12, 1986

Air Quality Control Region 5  
5602 Old Brownsville Road  
Corpus Christi, Texas 78415  
512/289-1696

Mr. V. Waylon Litton  
Manager of Safety/Hygiene  
SOUTHWESTERN REFINING COMPANY, INC.  
Post Office Box 9217  
Corpus Christi, Texas 78408-9217

Re: NESHAPS Asbestos Notification

Dear Mr. Litton:

This is in regard to your letter dated February 5, 1986 regarding asbestos removal from your company's Cat Cracker Unit. This letter acknowledges receipt of your letter and the methods described in your letter.

Should you have any questions, please do not hesitate to call Ms. Deborah Stine at 512/289-1696.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. T. Palmer".

W. T. Palmer, P.E.  
Regional Director

SWRf/Asbestos 6444

1H 041804



Celebrating 150 Years of Texas Independence 1836 - 1986

**U. S. Department of Labor**  
Corpus Christi Area Office  
Government Plaza  
400 Mann Street, Room 300  
Corpus Christi, TX 78401  
512-888-3257

Occupational Safety and Health Administration

Reply to the Attention of: RLMH:keg



February 12, 1986

Southwestern Refining Co.  
P.O. Box 9217  
Corpus Christi, TX 78408

Attn: Mr. Waylon Litton, Safety Manager

Dear Mr. Litton:

The Occupational Safety and Health Administration is currently conducting a National Emphasis Program for programmed health inspections of establishments where asbestos is used, stored or processed. Also included in this National Emphasis Program are any sites involving asbestos demolition and removal activities. (OSHA Instruction CPL 2.60B)

Currently OSHA receives notices regarding the asbestos demolition/removal activities from the Environmental Protection Agency and the Texas Air Control Board, but in an effort to improve its response time OSHA respectfully requests that your company notify us of any asbestos demolition or removal activities on your site.

OSHA would like for you to also inform your asbestos demolition/removal contractors of the assistance available from our local office. The local OSHA Office functioning as a full service office resource center will gladly meet with any asbestos demolition/removal contractors prior to their scheduled work. The 29 CFR 1910.1001 Asbestos Standard will be fully discussed including viewing of a video tape and/or slides. Also in this session will be a discussion of respiratory protection, other PPE and specific monitoring requirements.

For notification purposes the address of our office is as follows:

U.S. Department of Labor, OSHA  
Government Plaza  
400 Mann Street, Room 300  
Corpus Christi, TX 78401  
(512) 888-3257

Together we can make the workplace safer and more healthful.

Sincerely,

*R. L. Mike Hunter*  
R. L. MIKE HUNTER  
Area Director

SWRf/Asbestos 6445

1H 041805