BCC: 1)J. R. Cooper - Wilm.
2)G. J. Hollod
D. G. Jentsch
W. P. Ledet
J. D. Billings
C. H. Babowicz
G. E. Simmonds
[redacted]
1)R. E. Keith
2)J. O. Walling
1)B. Huante
2)M. K. Ahlstrom
V.P. File 60-70

PLAINTIFF'S EXHIBIT
DUP-462

PO-195

DUPONT

E. I. DU PONT DE NEMOURS & COMPANY (INCORPORATED)

VICTORIA
P. O. BOX
VICTORIA, TEXAS

PETROCHEMICALS DEPARTMENT

June 7, 1983

Mr. Bill Stewart (2)
Executive Director
Texas Air Control Board
6330 Highway 290 East
Austin, Texas 78723

Attention: K. A. Langley
Compliance

RE: NESHAPS Notifications of
Emergency Asbestos Removal - II
Du Pont, Victoria County, Texas

Dear Mr. Stewart:

On May 31, 1983, we sent you notice that on May 28, 1983, E. I. Du Pont De Nemours & Co.(Inc.), the owner, whose address is P. O. Box 2626, Victoria, Texas 77902, had started removal of approximately 4,600 sq.ft. of asbestos containing insulation from five distillation columns in our adipic acid plant (TACB Permit R-810) under emergency conditions. This letter amends that notice to include two more columns containing about 6,100 sq.ft. of asbestos insulation and an undetermined amount of process piping insulation. We expect to complete removal of insulation from all columns by June 27, 1983, and we will provide you additional information on the piping when we have it.

We have a serious corrosion problem and part of our plant is shut down until we can determine the extent of the damage and suitable remedial actions.

All asbestos will be disposed of on the Du Pont Victoria Plant in a disposal area registered by the Texas Department of Water Resources (Solid Waste Registration 30079). All asbestos will be placed in sealed plastic bags at the point of removal and kept sealed during movement and disposal on site.

Please contact me at (512)572-1277 if there are any questions or if you need additional information.

Very Truly Yours,

Andy Nickolaus

A. H. Nickolaus
Senior Environmental
Control Consultant
Engineering Division

CC: P. Kutchinski
TDWR - Corpus

W. T. Palmer
TACB - Corpus

DUP 0821243

PD-196

DU PONT



E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED

VICTORIA PLANT
P. O. BOX 2626
VICTORIA, TEXAS 77901

PETROCHEMICALS DEPARTMENT

bcc: 1) J. R. Cooper - Wilm
2) G. J. Hollod
D. G. Jentsch - 570
W. P. Ledet - 570
J. D. Billings - ACR
[redacted]
1) R. E. Keith - 3
2) J. O. Walling
1) B. Huante - 3
2) M. K. Ahlstrom
V. P. File 60-70

May 31, 1983

MR. BILL STEWART, P.E. (2)
EXECUTIVE DIRECTOR
TEXAS AIR CONTROL BOARD
6330 HIGHWAY 290 EAST
AUSTIN, TEXAS 78723

ATTENTION: K. A. LANGLEY
COMPLIANCE

RE: NESHAPS Notifications of
Emergency Asbestos Removal
Du Pont, Victoria County, Texas

Dear Mr. Stewart:

On May 28, 1983, E. I. du Pont de Nemours & Co. (Inc.), the owner, whose address is P. O. Box 2626, Victoria, Texas 77902, started removal of approximately 4600 square feet of asbestos containing insulation from five distillation columns in our Adipic Acid plant (TACB Permit R-810) under emergency conditions. Removal should be complete by June 10, 1983.

Removal under emergency conditions became necessary when inspection of some visually detericrating insulation revealed stress corrosion cracking of the stainless steel columns underneath. This insulation, installed nearly twenty years ago, contains enough chlorides to cause stress corrosion cracking if water gets to the interface between it and the stainless. We try to waterproof the insulation and we periodically cut windows to inspect, but when we do find corrosion, immediate removal is generally necessary for safety reasons. After repair, these columns will be recovered with non-asbestos insulation.

The removal job is being supervised by Du Pont personnel to insure that proper safeguards, work practices, and disposal procedures are followed. All asbestos is being "wetted" before handling. Respiratory protection is being worn as required. Proper hygiene and protective clothing is being worn. Caution signs are appropriately placed to alert workers to the presence of asbestos and that necessary precautions must be taken to enter the area.

DUP 0821244

All asbestos will be disposed of on the Du Pont Victoria Plant in a disposal area registered by the Texas Department of Water Resources (Solid Waste Registration 30079). All asbestos will be placed in sealed plastic bags at the point of removal and kept sealed during movement and disposal on site.

Please contact me at (512) 572-1277 if there are any questions.

Very truly yours,

Andy Nickolaus

A. H. Nickolaus
Senior Environmental
Control Consultant
Engineering Division

cc: H. P. Kutchinski
TDWR - Corpus

W. T. Palmer
TACB - Corpus

AHN/cgh

DUP 0821245