UNION CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

RECEIVED
JAN 31 1979
R. R. RANKIN

PLAINTIFF'S EXHIBIT
UC-1700

TO (NAME) Mr. W. H. Barlow
COMPANY Mr. H. P. Brady
LOCATION Mr. W. P. Haskins
Mr. J. C. Ledvina/A. D. Sampson
Mr. J. B. Leverton/F. S. Provenzano/
Mr. D. L. Engle

COPY TO Mr. J. D. Martin - 510
Mr. W. A. Mazzolini/P. D. Smith
Mr. R. R. Rankin
Mr. D. D. Robinson/W. P. Reeves/
Mr. R. M. Ewbank
Mr. J. C. Ronnander/R. E. O'Bryan
Ms. A. P. Yalcinkaya/H. R. Schulz

DATE January 29, 1979

SUBJECT Delegation of EPA Responsibilities for NSPS and NESHAPS Regulations to Texas Air Control Board

The attached notice from EPA, Dallas, concerns the first major delegation of responsibilities for Federal regulations to the Texas Air Control Board (TACB). As indicated in the notice, this plant has one or more units subject to these regulations. Following are the specific situations locally which fall under these regulations:

1) New Source Performance Standards (NSPS, 40 CFR, Part 60)

At the present time, we have no facilities covered by this regulations.

2) National Emission Standards for Hazardous Air Pollutants, (NESHAPS, 40 CFR, Part 61)

a) Vinyl Chloride Monomer (Subparts A and F)

Our Solvent Vinyl Resins process and the associated monomer tank car unloading facilities are presently covered. Please contact J. F. Erdmann or R. E. O'Bryan for any information or assistance needed in situations involving VCM.

b) Asbestos (Subparts A and B)

Any construction, maintenance or operation activities involving the handling of asbestos-containing materials, particularly insulation, are subject to this regulation. Most problems are in the removal and disposal of insulation from pipes and equipment to prevent personnel exposure to air-borne dust and to provide proper disposal. Please contact J. B. Leverton with copies to Ms. A. P. Yalcinkaya and J. C. Ledvina for information and assistance in the situations involving asbestos.

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PLAINTIFF'S EXHIBIT

UC-1700a

Any contact with the TACB on these matters should be directed to the Health and Environmental Affairs Department to enable us to maintain and use the proper channels of communication already established with this state agency.

As conditions change and other activities at this plant come under these two regulations in the future, proper notification will be made to all concerned. If there are any questions, please contact me for assistance.

Very truly yours,

J. F. ERDMANN

JFE:ir
Attachment

UCTC 17263

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