PLAINTIFF'S EXHIBIT
UC-4750

* UNION * CARBIDE *

HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS
SOLVENTS & COATINGS MATERIALS

P. O. BOX 471
TEXAS CITY, TX 77592

August 14, 1987

Mr. Ronald B. Schultz, Jr.
Air Control Division
Galveston County Health District
P.O. Box 939
La Marque, Texas 77568

Dear Mr. Schultz:

I have received your letter of June 19th concerning our procedures used in asbestos demolition activities. A direct response to your concern is that all future notices of asbestos demolition will contain a more specific description of the procedures used in the removal project.

As I am sure you are aware our facility has removed asbestos containing material for years using the "wet method" and sealing the material in impermeable plastic bags for disposal. This practice will be continued.

Thank you for your interest in our asbestos abatement procedures, and I trust that these actions will relieve your concerns.

Sincerely,

G. L. Rivera

kem/asb

UCTC 18868

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HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS
SOLVENTS & COATINGS MATERIALS

P. O. BOX 471
TEXAS CITY, TX 77592

July 1, 1987

Mr. Ronald B. Schultz, Jr.
Air Control Division
Galveston County Health District
P.O. Box 939
La Marque, Texas 77568

Dear Mr. Schultz:

I have received your letter of June 19th concerning our procedures used in asbestos demolition activities. A direct response to your concern is that all future notices of asbestos demolition will contain a more specific description of the procedures used in the removal project.

As I am sure you are aware our facility has removed asbestos containing material for years using the "wet method" and sealing the material in impermeable plastic bags for disposal. This practice will be continued.

Thank you for your interest in our asbestos abatement procedures, and I trust that these actions will relieve your concerns.

Sincerely,

G. L. Rivera

kem/asb

UCTC 18871

* UNION * CARBIDE *

HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS
SOLVENTS & COATINGS MATERIALS

P. O. BOX 471
TEXAS CITY, TX 77592

DRAFT

July 1, 1987

Mr. Eli Bell
Executive Director
Texas Air Control Board
6330 Highway 290 East
Austin, Texas 78723

Re: Renovation Notification

Dear Mr. Belll:

This is to notify you, as required by 40 CFR 61.146, that Union Carbide Corporation, Old Ridgebury Road, Danbury, Connecticut 06817, as owner, plans to engage in renovation activities as described below:

Insulation will be removed from 105 linear feet of pipe and 660 square feet of equipment located in No. 3 Olefins Unit, at 3301 5th Avenue South, Texas City, Texas 77590. The equipment is approximately 20 years old.

Removal of the insulation is scheduled to start on April 27, 1987, with completion by June 1, 1987. All asbestos containing material will be "wet removed" and sealed in impermeable plastic bags prior to removal from the demolition area.

All asbestos materials removed will be disposed at Gulf Coast Waste Disposal Authority, Loop 197, Texas City, Texas.

Yours very truly,

G. L. Rivera

cc: Dr. E. R. Ibert - GCACD, La Marque

kem/asb

UCTC 18872

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Bcc: C. L. Dudnick - 500
J. B. Evans - 500
K. E. Martin
L. D. Pell
G. M. Whipple - 500
R. E. Woodcock
A. P. Yalcinkaya

DRAFT

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GALVESTON COUNTY HEALTH DISTRICT

MAINLAND OFFICE: P.O. BOX 939, LA MARQUE, TEXAS 77568 (409) 938-7221
GALVESTON OFFICE: P.O. BOX 838, GALVESTON, TEXAS 77553, (409) 763-8531

ANIMAL CONTROL
GALVESTON COUNTY COORDINATED COMMUNITY CLINICS
GALVESTON EMERGENCY MEDICAL SERVICE
MOSQUITO CONTROL
POLLUTION CONTROL

PUBLIC HEALTH LABORATORY
PUBLIC HEALTH NURSING
SANITATION
VENEREAL DISEASE CONTROL
VITAL STATISTICS

June 19, 1987

RECEIVED
JUN 22 1987
H.E.A. DEPT.

Gilberto T. Rivera
Union Carbide Corporation
P. O. Box 471
Texas City, Texas 77592

Dear Mr. Rivera:

In a recent discussion with Steve Rossing of the Texas Air Control Board Region 7, the subject about NESHAP/Asbestos notifications arose. Steve and myself are both concerned about the lack of information that you provide in your notifications; concerning the techniquies that will be employed in the removal and disposal of the asbestos-containing material.

As provided in section 61.146 of 40CFR Part 61 Subpart M (Notification requirements) procedures to remove and dispose during demo/reno activities shall be recorded on the notification. We are interested in the procedures that will be employed during the removal project (i.e. wet removal) and methods used in the disposal process (i.e. double-bagged in polyethylene).

In the future, please be more specific about the removal and disposal procedures. If you have any questions, please contact me at 938-7221. Thank your for your cooperation.

Sincerely,

Ronald B. Schultz Jr.
Ronald B. Schultz, Jr.
Air Control Division
Galveston County Health District

RBS/pjg

xc: Steve Rossing, Texas Air Control Board, Region 7

Peri 6/22
Please take note to modifying the format.
Could you draft an acknowledgment letter to Schultz also?
Beth

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