UNION CARBIDE CORPORATION

P O BOX 471 TEXAS CITY TEXAS 77590

INDUSTRIAL HYGIENE

January 18, 1985

Dr. E. R. Ibert, Ph. D.
Director, Environmental Control
Galveston County Health Dept.
P. O. Box 939
La Marque, TX 77568

Subject: Response to Notices of Violation Dated January 9, 1985, Demolition of #2 Powerhouse and Butadiene Unit by Kimmins Corp. Contractors

Dear Dr. Ibert:

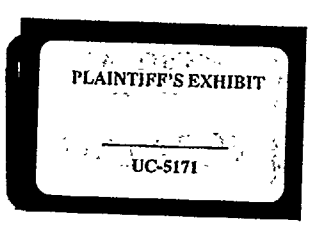
This letter is in response to the two separate Notices of Violation dated January 9, 1985. We have taken the following steps to assure that the NESHAP asbestos work practice requirements are complied with.

1. The contractor has been reinstructed to clean the area of asbestos insulation as soon as possible, and to continue to keep exposed asbestos wet at all times. Periodic inspections have been and will continue to be conducted by a UCC team in the demolition areas to assure that the contractor complies with NESHAP asbestos work practice requirements.

2. The insulation observed to be in the scrap iron container has been removed and bagged for proper disposal. It is believed that the insulation was in the container when it arrived on site from the subcontractor. The contractor has been advised that such containers should not be used on site unless they are free of asbestos-containing material.

3. The insulation observed at the base of a removed column has been properly bagged for disposal.

4. Mr. Mark DeWitt of Kimmins Corp. has advised us that the scheduled date of completion for the demolition has been changed, and that he has communicated the change to your office. We note that 40 CFR 61.146 does not require that changes to scheduled completion date of demolition or renovation be submitted to the agency.



We appreciate the opportunity to discuss asbestos related compliance matters with you last week. Please let me know if you have any questions or require further clarification.

Yours very truly,

A. Perihan Yalcinkaya

A. Perihan Yalcinkaya
Industrial Hygiene
Director

APY:IR:NOV10985

Bcc: Mark DeWitt - Kimmins Corp.
C. L. Dudnick - 500 (Law Dept.)
S. J. Footer
W. P. Haskins
J. B. Leverton
F. S. Provenzano
J. F. Erdmann
J. L. Glass