EXR 5-5-1-1
#111

8280 Sheldon Road
Post Office Box 777
Channelview, Texas 77530
Telephone 713 452 8888

Lyondell
Petrochemical Company

June 14, 1994

Texas Department of Health
Division of Occupational Health
Asbestos Programs Branch
1100 West 49th Street
Austin, Texas 78756-3199

Certified Mail
P 849 789 748

RE: Asbestos Notification
Lyondell Petrochemical Company, Channelview Operations

Dear Sir or Madam:

Please find attached an asbestos notification of demolition/renovation. Asbestos abatement will begin June 29, 1994, and end July 20, 1994. Should these dates change notification will be made immediately.

Please contact Ms. Josetta Jones at (713) 452-8837, if you have any questions.

Sincerely,

Kenneth J. Eckroth
Superintendent, Environmental Affairs
Channelview Operations

cc: U.S. Environmental Protection Agency
Attn: Mr. John Hepola
Chief, Region VI
1445 Ross Avenue
Dallas, Texas 75202-2733

Certified Mail
P 849 789 747

RECEIVED
94 JUN 20 PM 12:41
US EPA-DALLAS, TEXAS
AIR ENFORCEMENT BRANCH (6T-E)

For Office Use Only ☐ TAHPA ☐ NESHAP ☐ T ☐ H ☐ L Violation? ☐ YES ☐ NO RCVD / / POSTMARK / /

TEXAS DEPARTMENT OF HEALTH
DEMOLITION/RENOVATION NOTIFICATION FORM

Remittance #
7C790-089

NOTE: CIRCLE ITEMS THAT ARE AMENDED

Amount:
Notification#

1) Abatement Contractor: Northwinds Abatement, Inc. TDH License No.: 80-0054
Address: 903 Port Houston Street City: Houston State: TX Zip: 77029
Office Phone Number: (713) 671-5350 Job Site Phone Number: (713) 452-8837
Site Supervisor: David Miller TDH License Number: 80-3374
Trained On-Site NESHAP Individual: David Miller Certification Date: N/A

2) Project Consultant or Operator: Lyondell Petrochemical Co. TDH License Number: N/A
Mailing Address: P.O. Box 777
City: Channelview State: TX Zip: 77532 Office Phone Number: (713) 452-8837

3) Facility Owner: Lyondell Petrochemical Company Attn: Mr. Ken Eckroth
Mailing Address: P.O. Box 777
City: Houston State: TX Zip: 77532 Owner Phone Number: (713) 452-8757

4) Description or Facility Name: Lyondell Petrochemical Company
Address: 8280 Sheldon Road
City: Channelview Zip: 77530 County: Harris
Facility Phone Number: (713) 452-8888
Description of Area/Room Number: Tanks 28 and 29 in South Tank Farm
Prior Use: Storage tank Future Use: Storage tank
Age of Building: 38 yrs. Size: 31'diax33'h Number of Floors: N/A

5) Type of Work: ☐ Demolition: ☒ Renovation: ☐ O&M:

6) Is this a Public Building? ☐ YES ☒ NO Federal Facility? ☐ YES ☒ NO Industrial Site? ☒ YES ☐ NO

7) Notification Type **CHECK ONLY ONE**
☒ Original (10 Working Days) ☐ Cancellation ☐ Amendment ☐ Emergency/Ordered
If this is an amendment, which amendment number is this? ___ **(Enclose copy of original)**
If an emergency, who did you talk with at TDH? N/A Emergency # ___
Date and Hour of Emergency (HH/MM/DD/YY): N/A
Description of the sudden, unexpected event: N/A

Explanation of how the event caused unsafe conditions or would cause equipment damage (computers, machinery, etc.): N/A

8) Description of procedures to be followed in the event that unexpected asbestos is found or previously non-friable asbestos material becomes crumbled, pulverized, or reduced to powder:
Please see attached

9) Was an Asbestos survey performed? ☒ YES ☐ NO TDH Inspector License No.: N/A
Analytical Method: ☒ PLM ☐ TEM Laboratory License Number: 30-0040

10) Description of planned demolition or renovation work, and method(s) to be used:
Please see attached

11) Description of work practices and engineering controls to be used to prevent emissions of asbestos at the demolition/renovation site: Please see attached

12) ALL applicable items in the following table must be completed: IF NO ASBESTOS PRESENT CHECK ☐

RACM Material Type	Approximate amount of Asbestos		Check unit of measurement					
	Pipes	Surface Area	Ln Ft	Ln M	SQ Ft	SQ M	Cu Ft	Cu M
RACM to be removed (friable)	-0-	-0-						
RACM NOT removed (friable)	-0-	-0-						
Category I removed (non-friable)	-0-	10,600			X			
Category I NOT removed (non-friable)	-0-	-0-						
Category II removed (non-friable)	-0-	-0-						
Category II NOT removed (non-friable)	-0-	-0-						
RACM Off-Facility Component (friable)	-0-	-0-						

13) Waste Transporter Name: REM Waste Control TDH License No: 40209
Address: 10701 Todd Road City: Houston State: TX Zip: 77055
Contact Person: Chuck Gerhart Phone Number: (713) 686-6666

14) Waste Disposal Site Name: BFI Waste Systems
Address: 11013 Old Beaumont Hwy City: Houston State: TX Zip: 77078
Telephone: (713) 675-6101 TNRCC Permit Number: H0261

15) For structurally unsound facilities, attach a copy of demolition order and identify Governmental Official below:
Name: N/A Registration No: N/A
Title: N/A
Date of order (MM/DD/YY) / / Date order to begin (MM/DD/YY) / /

16) Scheduled Dates of Asbestos Abatement (MM/DD/YY) Start: 06/29/94 Complete: 07/20/94

17) Scheduled Dates Demolition/Renovation (MM/DD/YY) Start: 08/01/94 Complete: 10/01/94

Note: If the start date on this notification can not be met, the Asbestos Notification Section must be contacted by phone prior to the start date. Failure to do so is a violation and will result in official action being taken in accordance with TAHPA, Section 295.61.

I hereby certify that all information I have provided is correct, complete, and true to the best of my knowledge. I acknowledge that the building owner/operator is responsible for all aspects of the notification form, including, but not limiting, content and submission dates. The maximum penalty is $10,000 per day per violation.

K J Eckroth — Kenneth J. Eckroth — / / — (713) 452-8757
(Signature of Building Owner/ Operator) (Printed Name) (Date) (Telephone)

MAIL TO:

TEXAS DEPARTMENT OF HEALTH
DIVISION OF OCCUPATIONAL HEALTH
ASBESTOS PROGRAMS BRANCH
1100 WEST 49th STREET
AUSTIN, TX 78756
PH:512-834-6600, 1-800-572-5548

Faxes are not accepted *Faxes are not accepted* *Faxes are not accepted* *Faxes are not accepted*

Form dated 04/01/94. This form replaces TDH form (04/07/93) and TNRCC form (ACB-99B&C)(3/1/91)
For assistance in completing this form, call 800-572-5548 toll-free in Texas

Notification of Demolition/Renovation
Lyondell Petrochemical Company
South Tank Farm, Tanks 28 and 29
Supplemental Information

1. Per Notification Form

2. Per Notification Form

3. Per Notification Form

4. Per Notification Form

5. Per Notification Form

6. Per Notification Form

7. This is an Original Notification

8. Should unexpected asbestos be found or previously non-friable asbestos material become crumbled, pulverized or reduced to powder, the area will be immediately regulated with barricade tape and signage. The ACM will be encapsulated, properly bagged for disposal, and the area HEPA vacuumed and encapsulated.

   Should it be necessary, a Pressure Differential containment will be constructed. Proper PPE shall be donned at all times.

   If the amount of ACM found requires, the TDH will be notified immediately and amended notification shall be submitted.

9. Per Notification Form

10. Visual inspection of the exterior surfaces of Tanks 28 and 29 indicate corrosion pitting. In order to ascertain the extent of the corrosion and required repairs, it is necessary to remove 2% asbestos mastic coating in it's entirety to perform ultrasonic inspection of the tank shells.

AF Base

Coal tar enamel 1/4" thick like slate 400 ppm PCB

11. All Asbestos Containing Materials shall be removed in compliance with regulatory standards.

Mastic Removal

The 2% asbestos mastic coating shall be removed utilizing contained and regulated work areas.

An enclosure structure will be erected around each tank and will be covered with one layer of 6 mil reinforced polyethylene. These areas will be placed under a reduced pressure system with pressure differential machines to facilitate at least four air changes per hour.

The mastic coating will be removed by manual hand scraping. An airless sprayer loaded with a surfactant shall be used to constantly mist the air during the removal process. All mastic coatings shall be placed in labeled disposal bags, sealed in the approved goosenecked manner, and double bagged. Bags shall be wet wiped, passed through the load out area, and placed in an enclosed dumpster which has been lined with two layers of 6 mil poly.

A mastic removal agent shall be applied to the tank surfaces after all gross coatings have been removed. This shall be agitated with nylon brushes to facilitate the breakdown of the mastic. After a reasonable time has lapsed, the removal agent and mastic shall be picked up with squeegees, scrapers, HEPA vacuums, and disposable towels. All surfaces inside containment then shall be wet wiped and HEPA vacuumed again for final cleaning.

After a visual inspection has been performed and passed by Northwinds Abatement's Project Manager and the Hygienist/Consultant, all surfaces inside the enclosure shall be sprayed with a lockdown encapsulant once again utilizing an airless sprayer.

When sufficient drying time has elapsed, the appropriate number of clearance air sample pumps shall be placed both inside and outside the enclosure.

Clearance air levels of .01 f/cc or less will be achieved prior to dismantling the enclosure. Pressure differential machine intakes will be sealed with two layers of 6 mil poly prior to being de-engergized.

All poly from the enclosure shall be double bagged and disposed of as ACM.

PPE

Personnel Protective Equipment shall consist of two disposable suits with attached hood and booties, taped at the latex gloved wrists and PVC safety boots.

Respiratory protection will utilize ISI SAFEE, Supplied Airline Respirators operated in the pressure demand mode with emergency egress HEPA filter approval #TC-21C-385. Certified Grade D or better bottled breathing air regulated between 80 and 120 PSI supplies the respirator.

Decontamination Unit

A five chamber decontamination unit shall be constructed on site. This will be wooden frame covered with a minimum of two layers of 6 mil poly on the walls, roof, and floor. The shower pan is lined with eight layers of 6 mil poly.

The configuration of the decon unit is as follows:

Clean room, airlock, shower room, airlock, dirty room. At the entrance and exit of each chamber is a double 'Z' flap of 6 mil poly.

A pressure differential machine shall be connected to dirty room of the decon unit facilitating a minimum of four air changes per hour. Hot and cold potable water shall be plumbed to the shower.

All water will be filtered to 5 microns using a 50-5 micron filtration system and discharged to the local drainage/sewer system.

Personnel Egress from Containment

When the worker is ready to leave the work area he/she will remove the outer suit and place it in a disposal bag; HEPA vacuum his inner suit; wet thoroughly the respirator, boots and airline; don a clean suit and proceed to the dirty room of the decon unit.

Upon arriving in the dirty room, the worker shall remove both suits placing them in a disposal bag, remove boots, and step into the shower wearing only the respirator.

He/she will thoroughly wash respirator, head, and body before removing the respirator. When finished showering, the worker disconnects respirator from airline, and proceeds with respirator into clean room to don either a clean suit or his/her street clothes.

Waste Handling

All double bagged ACM shall be wet wiped and H.E.P.A. vacuumed prior to being passed out of the waste load out.

NAI employees shall don double disposable suits, latex gloves and PVC safety boots. The minimum respiratory protection for carrying bags to the asbestos dumpster shall be ISI Typhoon, Powered Air Purifying Respirators (PAPR's) with H.E.P.A. filter approval #TC-21C-492.

The disposal dumpster provided by Northwinds Abatement, Inc. shall be 40 yard closed top. NAI will line the interior of the dumpster with 2 layers of 6 mil poly and affix "Danger Asbestos" signs to the 4 sides of the box. The dumpster shall be placed in a regulated area with barricade tape and additional signage.

The double bagged ACM shall be carefully hand placed in the dumpster.

Third Party Air Monitoring/Industrial Hygiene

Air monitoring shall be conducted by a third party hygiene or consulting firm. Monitoring shall be conducted as follows:

Pre-abatement samples will be collected to verify fiber counts of ambient air.

Area abatement samples shall be collected both inside and outside the enclosure, at the exhaust of the pressure differential machines and in the clean room of the decon.

Personnel sampling consists of a minimum of twenty five (25%) percent of workers covering at least one person in each job description per shift.

On the first day of each new enclosure or work area, S.T.E.L. sampling will be conducted for 30 minutes on each job classification.

Clearance air sampling shall be conducted both inside and outside all containments.

All sample analysis shall be conducted by Phase Contrast Microscopy performed by an accredited lab.

12. There is approximately 5,300 sq.ft. of 2% asbestos mastic coating per tank for a total of 10,600 sq.ft. of Category 1 non-friable material to be removed.

13. Per Notification Form

14. Per Notification Form

15. Per Notification Form

16. Per Notification Form

17. Per Notification Form