PLAINTIFF'S EXHIBIT
UC-440

UNION CARBIDE CORPORATION
Industrial Chemicals Division - Taft Plant
P. O. Box 50 - Hahnville, LA 70057

File: 1,2,3,___ Tickle:_____
HL JEP JWW SR
JAN 13 1987
JHT WTG DLB PAU
Destroy ROUTE: S-D

TO: J. E. Pierce

DATE: January 9, 1987

CC: A. W. Carlson
F. A. Chapman
J. T. Dollar
M. T. Frey
E. W. Gernon
R. E. Hiecke
S. W. Kornegay
M. G. Russell

ORIG DEPT: Distribution

SUBJECT: General Distribution OS&HS

Attached is our response to the General Distribution OS&HS conducted October 13 to October 17, 1986.

The only major concern identified involved fire protection and vapor cloud mitigation on the LPG truck unloading facility. Since the audit, the gas detectors have been installed and placed in service. Projects to add additional spray heads and pilot heads are in progress.

Of the eighty-nine less serious concerns identified, 50% are complete and three were considered not to require additional action. Those not requiring action are:

LS2.1.3 No. 1 Tank Truck Rack

There may be times when four tank trucks are being loaded simultaneously by one technician. Unsafe conditions could result if a truck is overfilled due to insufficient monitoring.

Recommendations

Tank truck loading scheduling and staffing at the rack should be studied to determine safe work loads. Use of metered loading systems should be considered.

Response

Work load and staffing is always considered when determining safe work practices at the tank truck rack. Four trucks being handled by one technician does occur but only when the type of activity has been evaluated and considered safe.

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UNION CARBIDE CORPORATION
Industrial Chemicals Division
Taft Plant

January 8, 1987

TO: Mr. D. L. Brucker

CC:
Mr. H. M. Agee - 500
Mr. F. E. Andrews - 511
Mr. T. L. Bateman - 500
Mr. S. W. Clark - 511
Mr. R. R. Cremering - 511
Mr. J. T. Dollar - 519
Mr. W. T. Gray - 519
Mr. T. E. Hanning - 511
Mr. D. C. Harkins - 511
Mr. R. J. Ireland - 500
Mr. V. H. Johnkoski - 511
Dr. P. R. Kavasmaneck - 511
Mr. R. L. Kisker - 500
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Mr. H. Lamoutte - 519
Mr. D. C. Macauley - 500
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Mr. G. R. Pole - 511
Mr. J. H. Porche - 519
Mr. R. R. Rankin - 500
Mr. W. E. Shackelford - 500
Dr. L. F. Theiling - 511
Mr. J. W. Wittliff - 519

Subject: Taft Distribution General Facilities
Operational Safety/Health Survey

Attached is the plant response to the recent Distribution General Facilities Operational Safety/Health Survey (OSHS). To meet a desire to provide an OSHS for the total Distribution area, those tenant areas not covered in other 1985 - 1986 tenant OSHS's were included in this OSHS. At this time, the entire Distribution area (and some areas twice+) has been covered by a recent OSHS -- from both tenant and general facilities standpoint. The only area exception is ammonia facility OSHS scheduled for January, 1987.

Except for a couple of minor exceptions, all survey team recommendations have been accepted. Any exceptions are documented. All others have actions underway and many are completed. In addition, the identified deficiencies have been reviewed for possible plantwide implications and have caused additional actions to be initiated that impact beyond Distribution.

Since Distribution is a host function serving all tenants yet some distribution facilities are tenant specific, action plan items carry identification as to applicable tenant. This is to flag those that may be of specific interest to a tenant and where funding may be sought for corrective actions.

This response is directed to those on the original survey report distribution plus the Taft tenant APM's. The Taft APM's will be the Distribution Department contact for resolving any tenant issues -- technical, funding, etc. Subsequent action plan updates will be issued to those accountable for monitoring action plan performance plus the tenant APM's.

As indicated in a previous letter, the Taft Plant appreciates the Survey Team's efforts.

J. E. Pierce

pau/6907M
Attachment

.0	Field			
LH3.1.1	Amines areas do not require monogoggles.	Signs will be posted to require monogoggles.	MGR(1/31/87)	
LH4.0	General			
LH4.1	Sampling dripolene barges may be increasing personnel exposure potential.	The samples are needed to satisfy the sales contract. Sampling procedures require the use of fresh air, so there is very little personnel exposure potential.	JTD	complete
LH4.2	Potential exposure from tank gauging, pigging, etc.	While some of these operations are odorous, the monitoring data does not indicate overexposure. The department has an overall monitoring program.		complete
LH4.3	Acrylate odors perceived as health risk.	The fact that these odors are not a health risk has been communicated. Recommendations have been made to reduce these odors.	AWC(12/31/87)	
LH4.4	Potential benzene exposure from dripolene and naphtha not recognized.	• The warning signs at the docks will be made more specific to dripolene. • The potential for benzene exposure from naphtha has not been recognized in any of the benzene exposure activities to date. Monitoring will be done to determine if there is a potential exposure problem.	AWC(1/31/87) AWC(3/31/87)	
LH4.5	H-F-S logos are not up to date.	These will be reviewed and corrected.	MGR(1/31/87)	
LH4.6	Frequent tank gauging increases exposure potential.	Work to minimize hand gauging is ongoing.	MGR	complete
LH4.7	Potential exposure from open dome loading of methyl CELLOSOLVE.	Additional monitoring will be done, and procedures will be modified if new data indicates higher exposures than existing data.	REH(3/31/87)	
LH4.8	The Taft Plant does not have an overall program for asbestos.	Corrective action will be referred to the Safety & Health Department. The plant has a program; this OS/HS suggests review of the program for possible changes.	RWP(3/31/87)	
LH4.9	Misc concerns about the MSDS Manual: • Use of FP-209 vs FP-210. • Two sheets for butadiene. • Sheets for materials not handled. • Grossly over due sheets in the manual.	• The plant follows the NFPA, which uses FP-209. • There is one sheet for each type of butadiene handled. • Manual only contains sheets for materials handled. • The sheets identified are the most recent dates available to the plant. The manual has been updated 4 times in 1986.	AWC	complete