UNION CARBIDE

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UNION CARBIDE CORPORATION TECHNICAL CENTER
P O BOX 8361, SOUTH CHARLESTON WV 25303

Mr. J. E. Pierce*

TAFT Plant

November 18, 1986

PLAINTIFF'S EXHIBIT UC-441

Mr. H. M. Agee-500
Mr. F. E. Andrews - 511
Mr. T. L. Batemen - 500
Mr. D. L. Brucker - 519
Mr. S. W. Clark - 511
Mr. R. R. Cremering - 511
Mr. J. T. Dollar - 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
Mr. S. W. Kornegay - 519
Mr. D. C. Macauley - 500

Taft Distribution
OS/HS

Mr. D. M. Mings - 515
Mr. J. E. Neff - 511
Mr. R. W. Pfeiffer - 519
Mr. G. R. Pole - 511
Mr. J. H. Porche - 519
Mr. R. R. Rankin - 500
Dr. L. F. Theiling - 511

Dear Mr. Pierce:

Attached is the final report of the Taft Distribution Facilities Operational Safety/Health Survey (OS/HS) conducted during the week of October 13, 1986 by Messrs. Cremering, Dollar, Hanning, Mings, Pole, and me. Comments on the preliminary report presented on October 17, have been received and incorporated into this final version.

As described in the report, the team noted a number of positive aspects of the distribution operations including good control of open-ended valves, well-designed operations guides, and high technician experience levels. As is the purpose of such activities, however, the team also identified a number of areas of concern, none of which was of an imminent nature requiring immediate correction. One area, involving in-plant storage and unloading of LPG's, was classified as a major concern because of deficiencies in fire protection and vapor cloud detection and mitigation facilities. The team recognizes that there is a gas detection installation underway for these facilities, but it was not yet in place at the time of the survey.

It is customary for the surveyed facility to develop an action plan addressing the concerns in the report within about sixty days of issue of the final version. This action plan should be addressed to Mr. D. L. Brucker with copies to me and others as outlined in the OS/HS Guidelines.

OPERATIONAL SAFETY/HEALTH SURVEY

TAFT GENERAL DISTRIBUTION FACILITIES

SURVEY DATES: October 13-17, 1986
REPORT DATE: October 30, 1986

Team Members

R. R. Cremering
J. T. Dollar
D. M. Mings
G. R. Pole
J. M. Poulson

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LH4.5 The H-F-S logos for several chemicals are not up-to-date. For example ethylene glycol tanks are labeled as 2-1-1 and should be 4-1-1. Tank 3100 and 5101 (both for naphtha) have different H-F-S logos.

Recommendations

Check with the plant industrial hygienist for the proper H-F-S logo for all chemicals handled in Distribution.

LH4.6 Frequent gauging of tanks increase the potential for exposure to chemicals.

Recommendations

Accounting procedures should be reviewed. Existing gauges should be replaced with more accurate devices.

LH4.7 Concern has been expressed over the open dome loading of Methyl CELLOSOLVE, especially with respect to female employees. UCC recognizes Methyl CELLOSOLVE as an animal teratogen and follows an exposure standard of 2 ppm for women of child bearing potential. The standard followed for other persons is 5 ppm.

Recommendations

a. Establish exposure monitoring data for the open dome loading of Methyl CELLOSOLVE.

b. Consider use of additional warning signs when loading this compound.

c. Investigate alternative procedure to open dome loading.

LH4.8 The Taft Plant does not have a formal program for identifying and labeling asbestos insulation. The current procedure is to sample suspect insulation before work is performed. This practice may be inefficient in that a pipeline may be sampled at different points along its length. It appears that no records are kept when asbestos sampling is done. The Taft Plant Safety and Health Manual standard for handling asbestos is outdated. The asbestos standard exposure limit was lowered in July of this year to 0.2 fibers per cubic centimeter of air from 10.0. It now has an action level of 0.1. A plant communication containing new exposure limits for asbestos has been issued.

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Recommendations

a. Consider a program for asbestos identification.

b. Update the Taft Plant standard on asbestos. Contact the industrial hygiene area concerning the update.

LH4.9 The Material Safety Date Sheet Manual for Distribution is well-formatted but needs updating. For instance, definitions for H-F-S ratings should be from the C&P Safety and Health Standard FP-210 and not FP-209. Several sheets from outside vendors (acetaldehyde, for example) are not dated. In addition, butadiene has sheets from Amoco and UCC. This can be confusing and only one sheet (preferably UCC) should be retained. Sheets for chemicals not listed in the table of contents or currently handled in Distribution should be removed. 1, 4-Dioxane and tetrahydrobenzaldehyde are examples. Sheets for this manual should be checked annually to make sure that any revisions are quickly communicated to the Distribution staff. Examples of grossly overdue sheets are pyrolysis gasoline (dripolene) - dated 7/82, ethyl acrylate - dated 9/81, and methyl carbitol - dated 7/81.

Recommendations

Update the Distribution MSDS Manual on an annual basis.

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