UNION CARBIDE CORPORATION Internal Correspondence

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PLAINTIFF'S EXHIBIT UC-442

TO: J. B. Evans
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Danbury

Date: January 2, 1987

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Subject: Texas City Solution Vinyl Resins - OS/HS

The action plan addressing the concerns of the 1986 Operational Safety/Health Survey (OS/HS) of the Texas City Solution Vinyl Resins Unit is attached.

The action plan format has been revised to clarify the responsibility, planned completion date, and the status of all recommendations. This issue of the action plan addresses the less serious concerns for the first time. Action plans addressing the less serious concerns have been developed to assure prompt completion. Some of the less serious concerns have not been fully explored to determine the appropriate corrective action. The completion dates for these unresolved action plans are shown as TBD (To Be Determined). A summary of the status of the attached action plan is provided below.

| | Recommendations Submitted | Number Complete |
|---|---|---|
| Major Concerns | 20 | 4 |
| Less Serious - Safety | 119 | 20 |
| Less Serious - Health | 27 | 4 |

If you have any questions, please contact the writer.

David R. Hall
(UNICOM 527-5180)

DRH:jah
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LESS SERIOUS CONCERNS - HEALTH (Cont.)

LH11 General

LH11.1 Deteriorated and exposed insulation which probably contains asbestos was observed at several locations in the unit. However, in general, the majority of the insulation appeared to be in good condition. Some areas where deteriorated insulation was noted included B-122 varnish tanks (13023, etc.), steam lines on north side of B-122, and several lines in the basement of B-113.

Recommendation

Depending upon the state of disrepair, old asbestos insulation should be recovered and labeled or removed completely.

Comments:

Working - An asbestos action plan is being developed.

Resp. MGS Planned Completion Date: On-Going

LH11.2 Maintenance employees use control rooms as eating and break areas. In general, this is not a good practice since (1) their presence can be a distraction to the operator during an emergency, (2) it increases the number of people potentially exposed during a release, (3)there may be an insufficient supply of escape respirators, and (4) eating in areas where chemical exposure may occur can result in inadvertent ingestion (at low levels) of chemicals.

Recommendation

Provide a break area for maintenance employees.

Comments:

Working - A break area is being provided.

Resp. DRH Planned Completion Date: 6/87

LH11.3 The estimated total solvent loss for the unit ranges from 30,000 to 50,000 lbs per day. The most significant contributor to this total is probably B-121 acetone and vinyl acetone fugitive losses. These losses seem excessive and are a major factor in employee exposure, fire, environmental, and material loss concerns.

Recommendation

Identify the major emission points and qualitatively if not quantitatively estimate the losses at each point. From this information establish a priority list of emission points to be controlled and develop and implement an action plan for each.

*Union Carbide trial exhibit UC-442: D. R. Hall to J. B. Evans Transmitting the 1986 OS/HS Action Plan for the Texas...* Published by AsbestosClaims.Law

ACL Doc 15689 · Page 2 of 2 asbestosclaims.law/library/15689/2