9/29/86
PLAINTIFF'S EXHIBIT
UC-835

- Removal, modification and/or disposal of asbestos-containing materials; and

- Use of asbestos-substitute materials.

To Line Operations Management

- Implement C&P Standard Practices for the identification, removal, modification, and disposal of asbestos-containing materials.

- Implement C&P Standard Practices covering asbestos substitute material applications, and communicate the service experience with these materials.

To Manufacturing Services

- Monitor use of asbestos-substitute materials and communicate the service experience with these materials.

To C&P HS&EA

- Audit compliance with governmental regulations and C&P Standard Practices relating to asbestos-containing materials and, where applicable, their substitutes.

C. C. Neely
47071

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Send copies to SHAC

Sent copy to: LE Calvert
SW Clark
GB Edler
RW Engle
SS Mayphree

00003

UNION CARBIDE CORPORATION
ENGINEERING, MANUFACTURING AND TECHNOLOGY SERVICES DEPARTMENT
HEALTH, SAFETY AND ENVIRONMENTAL TECHNOLOGY
South Charleston, West Virginia

BUSINESS CONFIDENTIAL MEMORANDUM
May 19, 1987

RECEIVED
MAY 21 1987
CCN

RECEIVED
MAY 27 1987
S. W. CLARK

TO: T. L. Grittie - 380, Bldg. 2000
G. W. Wulfert - 380, Bldg. 33
W. J. Vincent - 514, Bldg. 109-2
J. R. Dement - 514, Bldg. 309-2

COPY: D. A. Gosselin - 514, Bldg. 82
C. C. Neely - 511, Bldg. 2000
P. R. Kavasmaneck - 511, Bldg.2000

FROM: T. E. Hanning

SUBJECT: FOR YOUR INFORMATION AND USE
ASBESTOS REMOVAL WORK

Mr. Roger W. Hornbaker, a representative of Project Development Group, Inc. (PDG), met with me last week and discussed his company's willingness to bid on asbestos removal work within West Virginia. PDG is based in Pittsburgh and has performed asbestos removal jobs in Newport News, Virginia and Chicago.

PDG is insured for asbestos work and bondable, if required. Bids will be offered on a lump sum or time and material basis. All air monitoring results will be performed in certified AIHA labs. Credentials and pre-qualification information will be sent upon request.

As asbestos removal becomes necessary, you may wish to include PDG in the bidding process.

Sincerely,

Terry

Terry E. Hanning
2000/3328
Extension 5903

TEH
05/19/87

Project Development Group, Inc.
10 Duff Road Pittsburgh, PA 15235
412-243-3100

Roger W. Hornbaker

Asbestos Assessment and Abatement

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UNION CARBIDE CORPORATION 1300 Hercules Avenue - Suite 202
Engineering, Manufacturing & Technology Services Houston, Texas 77058

00003

W A N G TO W A N G

DATE: May 27, 1987

TO: Attached List

CC: Attached List

SUBJECT: Safety Alert

Two locations have had incidents with the potential of personnel exposure to inadequate atmospheres in enclosures built for work on asbestos containing materials. Be sure your people are aware of the potential of these hazards and testing is done to insure oxygen, explosion limits, and that TLV requirements are met. The enclosures are confined spaces and need to meet your location requirements.

Both locations are conducting investigations of the incidents and we will send those as soon as they are available.

Thanks.

Very truly yours,

UNION CARBIDE CORPORATION

Larry E. Calvert

LEC:cb
7222K

A04907

UNION CARBIDE CORPORATION
[illegible] HERCULES AVENUE, SUITE [illegible]
HOUSTON, TEXAS 77058

C0003

26 May 1987

TO: Attached List

CC: Attached List

SUBJECT: FINAL DRAFT OF RECOMMENDED C&P PROGRAM PHASE-OUT USE OF ASBESTOS-CONTAINING MATERIALS IN WORK PLACE - CHEMICALS AND PLASTICS GROUP

In the package I sent out April 28, 1987, I made two mistakes. Please note the corrections as follows.

- Paragraph two, last sentence should be 1989 not 1987. Although, as pointed out, it may not be pertinent that 1989 is the approved date.

- The recommended C&P Program attached was supposed to be the revised 9/29/86 draft, not the 8/28/86 draft. I have attached the 9/29/86 document. The key change is that the 9/29/86 document is defined as a program not a policy.

My apologies for the errors.

Larry

Larry E. Calvert

LEC:ka
Attachment
7212K

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9/29/86

D R A F T

RECOMMENDED C&P PROGRAM

CHEMICAL AND PLASTICS BUSINESS GROUP (C&P)

GOAL: PHASEOUT USE OF ASBESTOS-CONTAINING MATERIALS[1] IN THE WORK PLACE

PURPOSE/BACKGROUND

The Corporate Charter (1.1) contains the following commitment to employees:

> "To provide working conditions, programs of training and education, and persistent review and appropriate modification of facilities and practices to protect the health and safety of employees."

It also contains a social commitment to conduct business "in accordance with all the applicable national and local laws and regulations."

As a result of available evidence that airborne asbestos in the occupational environment had proven to be carcinogenic in man, all C&P Insulation Standards were revised in 1976 to specify only asbestos-free insulating materials; and new or replacement installations of these materials have subsequently been selected accordingly. Additionally, a Safety/Health Standard designated SH-256 was prepared covering the safe removal and handling (includes disposal) of asbestos-containing insulating material during renovation and demolition. The requirements of this Standard equal or exceed those of current applicable government standards.

OSHA's rule-making efforts relative to asbestos usage in the work place are mired in controversy. Hearings on the latest EPA proposal which includes the phaseout of all asbestos over a ten-year period are now in progress. The proposal states: "EPA is considering banning the manufacture, importation, and processing of asbestos construction products and asbestos clothing soon after the rule's promulgation with the category of asbestos friction products banned about five years later, and other asbestos products banned at a later time." Gaskets and packing that contain asbestos are in the category of "other asbestos products" that would apparently be banned after ten years. No peer company that we are aware of has a target date for removal of existing asbestos-containing insulation, gaskets, or packing; however, one major chemical company has recently discontinued the purchase of asbestos-containing gaskets and packing.

A cost analysis of pipe-size gaskets shows that GRAFOIL®, probably the most expensive of the acceptable gasket substitute materials, is, in fact, cost effective when the cost of mandatory work practices associated with the use of asbestos (e.g., wetting for removal or airborne fiber

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(1) "Asbestos-containing materials" include but are not limited to insulation, gaskets, packing, welding blankets, and construction products.

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exposure monitoring during removal, placing in labeled plastic bags after removal, landfill disposal, and record keeping) is considered. The same conclusion is drawn relative to valve packing when the additional considerations of improved service life and sealability are included.

Consistent with the aforementioned commitments and the economic use of materials, C&P has concluded that positive actions relative to asbestos-containing materials(1) should be taken.

RECOMMENDED C&P PROGRAM

Except as otherwise provided by applicable law, Chemicals and Plastics Business Group will:

Continue to phase out the use of asbestos-containing materials:

- Asbestos-containing insulation shall be replaced with asbestos-free materials as required to maintain structural and functional integrity.
- No asbestos-containing materials shall be purchased after January 1, 1989.
- C&P Standard Practices shall be employed for the identification, removal, modification, and/or disposal of asbestos-containing materials; and for use of asbestos-substitute materials.
- Evaluation of asbestos-substitute materials shall include consideration of health effects as well as suitability for intended service and cost.
- A variance approval procedure shall be employed to cover consideration of uncommon circumstances. Approval must always include endorsement of C&P HS&EA management.

SCOPE

This Recommended Program applies to all C&P operated/hosted facilities. Other components of the Corporation will be apprised of its content.

DELEGATION

The assignment of duties and authority to carry out the Recommended C&P Program defined herein is delegated as follows:

To Central Engineering Department

- Develop and maintain C&P Standard Practices covering:
  - Identification of asbestos-containing materials;

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