UNION CARBIDE

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT
UC-898

HEMICALS AND PLASTICS • INSTITUTE PLANT P. O. BOX 2831, CHARLESTON, WEST VIRGINIA 25330

(Name) Distribution Lists A-3, C-6, C-7, E-6 and E-13
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Date March 30, 1977

Originating Dept. Industrial Hygiene

Subject Update of Procedure for Protection Against Inhalation of Asbestos Fibers

The attached procedure is to be used for the protection of personnel against inhalation of asbestos fibers and to assure compliance with OSHA Regulation 1910-1001.

The use of asbestos insulation in the Institute Plant was phased out in 1974 which leaves only gasket material, tape and rope packing as the commonly used asbestos material in the Plant. Most insulation done prior to 1974 involved the use of asbestos material.

Demolition and removal of asbestos from equipment that was insulated prior to 1974 creates a potential for asbestos exposures. This type demolition is not only regulated by OSHA but also by the Environmental Protection Agency (EPA). EPA requires notification if rather large quantities of asbestos are to be removed under the terminology "demolition". C&P Environmental Protection Group is preparing a statement of C&P's position for the requirement.

OSHA regulation states that "no employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 fibers, longer than 5 micrometers, per cubic centimeter of air." "The eight-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed two fibers, longer than 5 micrometers, per cubic centimeter of air." A further reduction to 0.1 fiber per cubic centimeter of air has been proposed.

The requirements of OSHA and EPA can be handled by the Industrial Hygiene Department if information and cooperation is furnished by personnel responsible for work with asbestos. Since air sampling must be performed in the breathing zone of the employee being exposed to asbestos, the Industrial Hygiene Department shall be notified when any demolition or removal is done for quantities of asbestos in excess of 5 meters in length for piping or 5 square meters on ducts, stills, tanks, etc. Naturally, we would like to know when any job is to be done with asbestos, but realistically, quantities involving the above amounts should permit adequate evaluations of conditions that may be detrimental to health of personnel. Other requirements include personnel protective equipment, housekeeping, waste disposal, recordkeeping and medical examinations.

Very truly yours,

Fred Williams

FWilliams/myb

Mandatory Precautions and Procedures

When Handling and Working With Asbestos

1. Industrial Hygiene Department must be notified when quantities of asbestos in excess of 5 meters on piping or 5 square meters on ducts, stills, reactors, tanks, etc., is stripped during demolition or renovation. Advance notice of at least one workday should be given if possible so that Industrial Hygiene can make proper preparations for sampling.
2. Respirators shall be worn while removing and cleaning up all types of insulation whether asbestos is present or not.
   A. Normal dust exposures - 3M respirator, No. 8710.
   B. Heavy dust exposures - Supplied air respirator; either air hose or cylinder.
3. Work Area precautions shall include:
   A. Rope off work area with yellow barricade tape.
   B. Warning lights shall be posted outside each roped off area or affixed to barricade tape.
      (1) Signs are available from Safety Supply.
   C. Drop cloths, tarpaulins, or polyethylene film shall be used over grating to contain falling asbestos debris.
4. DO NOT USE COMPRESSED AIR TO REMOVE DUST FROM SKIN OR CLOTHING. Clothing contaminated with asbestos shall be exchanged after each shift or completion of the job. If contaminated with asbestos, clothing should be placed in a polyethylene bag to be sent out for laundering. Bags should be marked with the specified OSHA warning:

CAUTION

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust May Cause

Serious Bodily Harm.

5. Wet cleanup or vacuum shall be used when practical. NEVER BROOM SWEEP, BRUSH OR AIR BLOW. Stripped asbestos material shall be placed in special dustproof polyethylene bags. These bags with specified OSHA warning are available in Stores. The bags shall be securely wired closed.

6. Disposal of the bags containing asbestos shall be made by landfill. Care should be taken during disposal to insure that these bags shall not be broken open before covering with non-asbestos containing materials.

7. MEDICAL SURVEILLANCE will be conducted by Plant 512 Medical Department.

8. A. Tags and bags should contain the following statement (available in Stores):

CAUTION

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust May Cause

Serious Bodily Harm.

B. Warning signs should contain the following statement (available from Safety Supply):

ASBESTOS

Dust Hazard

Avoid Breathing Dust

Wear Assigned Protective Equipment

Do Not Remain In Area Unless Your Work Requires It.

Breathing Asbestos Dust May Be Hazardous To Your Health.

9. Air sampling results shall be maintained by the Industrial Hygiene Department.

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