PLAINTIFF'S EXHIBIT
UC-915

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

RIVER ROAD, BOUND BROOK, NEW JERSEY 08805

To (Name) Mr. R. A. DeCoudres
Division Chemicals and Plastics
Location Bound Brook, New Jersey

Date January 4, 1973

Originating Dept. Environmental Protection

Answering letter date

Subject In-Plant Activities
December 1972

Copy to Mr. J. L. Goodson
Mr. R. E. Graebert - SC
Mr. R. A. Henderson
Mr. W. C. Lund
Mr. R. C. McClintick
Dr. C. S. McKinley
Mr. D. C. Metz
Mr. W. D. Neal
Mr. E. B. Sharp
Mr. P. R. Wildgen
Mr. J. P. Zuccarelli

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Following are brief summations of internal environmental items of consequence at Bound Brook during the month of December:

OSHA Inspection - The mid-November OSHA inspection did, indeed, lead to a citation for violation of our safe entry procedures into confined spaces. A penalty of $105 was assessed and subsequently paid. OSHA set a compliance date of December 29, but abatement actions had all been taken prior to their Compliance Officer's follow-up inspection on December 26. Upon reviewing our abatement actions with the Safety Director and then talking to union officials, the OSHA Compliance Officer expressed satisfaction and said he considered the case closed. Messrs. DeCoudres and Zuccarelli's letters of December 27 documented the matters.

Sewer Systems - Other than somewhat high % LEL readings, due mostly to toluene from the spillrooms, there were no problems with operating the sewer systems during December. Some progress was made in getting the Bldg. 11 and Bldgs. 21-41 meters ready for service, but they are not yet back on line; the Security Office meter required frequent adjustment, raising a question as to adequacy of instrument service. With the extent of sewer monitoring via instrumentation expected to increase markedly in 1973, this service will have to be both top quality and timely provided.

No indication has yet been received from the Environmental Protection Operations Team as to the extent of their support of Bound Brook's proposed 1973 EP capital program, which begins with modification of storm sewers to retain and divert modest chemical spills into the MCSA system and follows with installation of automatic sampling equipment and an on-line TCA, along with equipping the EP Laboratory for water analytical service.

Waste Disposal - Hard waste volume dropped markedly in December from the high levels of the preceding months. Bldg. 105 quantities remained high. Disposal operations were hampered by breakdown of one of Scientific's special vehicles.

Airborne Asbestos - Consultant Bradley's letter report on his Bound Brook findings raised some concern, but found little agreement, among plant personnel involved with the Molding Materials situation. Further monitoring of airborne fibers in the working areas and cross-checking of the slide counts will provide a preponderance of data for settling the controversial matter. In the meantime, concern has focused on product handling and the potential hazard in customer's operations, and further downstream, emphasized by the inclusion of UCC as a co-defendant with other suppliers in a class action type lawsuit. The EP Lab. has evaluated several product samples specially prepared by R&D to minimize airborne fibers during handling. Messrs. Albright and Swalm reviewed the asbestos situation with Mr. Graebert, Chemicals and Plastics Safety Director, to help clarify the Plant's posture on this potential hazard to health.

Dust - Preliminary sampling of airborne dust around masterbatch Line 9 indicated high levels of total dust in the charging areas. A refined sampling procedure will be utilized to sample for carbon black dust, alone. The Banbury area did not appear to pose a dust problem.

Noise - Measurements of noise levels were made for P&D in the vicinity of a new grinder installation at Bldg. 96.

Odors - An odor complaint at the R&D mall could not be verified, apparently due to rapid dissipation of any fumes that may have been present. No other odor complaints were received in December.

Carbon Monoxide - Guidelines as to Chemicals & Plastics posture on OSHA standards for carbon monoxide exposure were received from the Safety Director. Pending final selection by OSHA of an approved CO - in-air analyzer, Bound Brook will utilize colorimetric tubes to approximate CO levels in potential exposure areas.

Safety Audit - The annual Safety Audit of the Bound Brook Plant was conducted over a 2-day period early in December by a Chemicals and Plastics team headed by Mr. Taylor. A discussion was held with one team member, Mr. Finn of South Charleston, concerning the organization of the environmental function at this location, particularly as it encompasses not only EP but also OSHA compliance programs and affairs.

J. M. Swalm

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