PLAINTIFF'S EXHIBIT
UC-1070

UNION CARBIDE

INTERNAL CORRESPONDENCE

INDUSTRIAL HYGIENE

P. O. BOX 471, TEXAS CITY, TEXAS 77590

July 17, 1985

To: S. J. Footer
D. R. Reem
Texas City Plant

Copy to: T. L. Bateman
J. B. Leverton
J. Schultz
A. P. Yalcinkaya

Subject: Texas City Plant Asbestos Concerns

Asbestos containing insulation and an assortment of other materials (transite, ceiling tile, accoustical lagging, gasket, etc.) have been elevated to a high priority health-public relation concern in the Texas City Plant. With the advent of the EPA regulation of asbestos renovation or demolition this site has been subjected to a series of inspections by the Galveston County Health Department that resulted in six (6) Notices of Violation. In January of this year the Galveston County Health Board granted the Health Department permission to file suit against Union Carbide if violations were found in the future. (Daily Sun article attached.)

The state has now begun to issue fines for past notices of violations at the Texas City Plant. These 6 NOV's have not been acted on but potential fines could total $25,000 per violation (BNA article attached).

To date Mr. J. Ickes, the County Inspector, has limited the scope of his site visits to active demolition projects. This, however, is no guarantee that future visits by the County Health Department will be limited to active demolition work sites. Due to the age of our facilities an extensive amount of insulation is open to the environment and would provide fertile ground for the inspector to raise the question of violation of EPA standard and/or potential exposure to employees and community. This concern is being addressed by the plant thru an effort headed by Mr. Joe Schultz. To date the plant has surveyed to establish priorities for corrective action, cost, and potential methods of correction. No. 2 Olefins was identified as the top priority due to the amount of insulation exposed and proximity to employees.

Asbestos bearing insulation in No. 2 Olefins is concentrated on the equipment on the NE corner of the unit adjacent to Bldg. 133 laboratory, and is badly weather due to the effects of hurricane Alicia. In view of the units present status, the apparent best method of insulation removal would be to lay the equipment down prior to demolition. Asbestos containing insulation in the remainder of the unit is primarily associated with steam lines, acetelyne lines, and column bases.

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Any work involving this area will require written notices to the Texas Air Control Board and will subject us to potential inspections. Inaction holds the plant up to potential adverse publicity for contributions to public exposure to asbestos.

It is my recommendation that the plant proceed with removal or renovation of exposed insulation on the theory that it would be more desirable to be accused of doing something rather than doing nothing.

Sincerely,

Kirk E. Martin

KEM:IR:

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