UNION CARBIDE

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT
UC-1083

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

May 16, 1985

To: Plant Letter Lists: A, B, C1 and C2

Subject: Asbestos Insulation Action Plan

All of us are becoming increasingly aware of the concern about the potential health hazards of asbestos. I assure you that the Plant Managers Group has been and continues to be very much concerned about these potential hazards.

Recently, Joe Schultz was asked to develop an action plan which addresses the concerns about asbestos in the plant. The Managers Department has reviewed his action plan (copy attached) and given it 100% endorsement.

Since this project has an early completion date of July 19, 1985, Joe will need your full cooperation and support to complete the project on time.

F. S. Provenzano

FSP:JFS/vl

JS58523

UCTC 06766

ASBESTOS INSULATION ACTION PLAN

Objective

To have developed an Action Plan that addresses the asbestos concerns of the Texas City Plant.

Standards

The Action Plan will:

1. Be in compliance with and consistent with existing governmental regulations concerning asbestos.
2. Be acceptable to the local, state, and federal enforcement agencies.
3. Be in accordance with the plant procedure dealing with asbestos.
4. Be acceptable and receive U/A of MC, Industrial Hygiene, and Safety groups.
5. Prioritize problem areas based upon criticality.
6. Provide recommendations for repairs to owning Department Head.
7. Require quarterly progress reports to be issued to Plant Managers and Department Heads.

Prioritization of Problem Areas

1. Exclude units/areas where insulation installations are in accordance with Engineering Standards which specify materials other than asbestos.
2. Complete a thorough "walk through" inspection of the Texas City Plant, exclusive of "1" above. Formulate a prioritized phased plan to correct problem areas.
3. Establish priority guidelines based upon potential personnel exposure and/or environmental contamination.
4. Use a team effort to conduct the plant "walk through" inspection.
5. Obtain U/A and document priority list.
6. Obtain cost estimate.

UCTC 06767

Information Gathering

1. Contact other industrial firms to obtain information on their asbestos plans/procedures/practices (if any).

   a. Monsanto
   b. Amoco
   c. Shell

2. Ascertain and contact asbestos containment/handling specialty firms.

Inspection of Facilities

1. Project Coordination

   a. The project coordinator will be J. F. Schultz.
   b. Completed facilities inspection data to be delivered to J. F. Schultz.

2. Recommended Inspection Procedure

   a. Manufacturing Departments

      1) Each Department Head to assign a departmental staff member(s) who will act as the inspection team captain and be responsible for completing the inspection and documentation of "asbestos suspect" insulation.

      2) Guidelines intended to assist in the inspection are listed as Item 3 below.

      3) Data sheets for documentation will be provided.

      4) It is suggested that the inspection team include the following skills if possible:

         a) Industrial Hygiene representative
         b) Hourly insulator craftsman
         c) Unit DPS
         d) Unit Chief Operator or Operator

   b. Main (Plant) Piperacks

      1) Inspection of the condition of insulation will be performed by hourly personnel; supervision will be provided.

      2) Copies of the recently revised "Piperack Identification Drawings" will be supplied in order to expedite the inspection. Also, data sheets for documentation will be provided.

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ACL Doc 16267 · Page 3 of 4 asbestosclaims.law/library/16267/3

3) The condition of insulation on piperack piping is to be documented using the guidelines listed below.

4) Insulator Craft and/or Industrial Hygiene personnel assistance can be provided upon request. Usage of these skills is recommended where appropriate.

3. Inspection Guidelines

a. Inspection teams should use the following guidelines for inspecting and documenting "asbestos-suspect insulation" requiring repair.

1) Loose insulation and/or insulation subject to falling to a lower level.

2) Exposed insulation visible from normal work areas.

3) Exposed insulation which could result in personnel exposure to asbestos.

4. Implementation

a. Walk through inspection and documentation of piperacks.
b. Walk through inspection and documentation of units.
c. Plot plan recording/documentation of findings.
d. Recording/documentation on schematics or drawings where possible.
e. Photographs where applicable/possible.

JFSchultz/vl
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ACL Doc 16267 · Page 4 of 4 asbestosclaims.law/library/16267/4