UNION CARBIDE

INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS

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

PLAINTIFF'S EXHIBIT
UC-1094

TO (NAME) Mr. F. S. Provenzano

COMPANY

LOCATION TEXAS CITY PLANT

DATE November 9, 1979

COPY TO
Mr. W. H. Barlow
Mr. J. H. Barrett*
Mr. T. O. Blum
Mr. D. L. Engle*
Dr. D. H. Glenn
Dr. J. J. Higgs*
Mr. A. N. Jivan*
Mr. J. S. Knight*
Mr. K. E. Martin
Mr. W. P. Nickles*
Mr. D. R. Reem*
Mr. R. Ritchie
Mr. A. D. Sampson*
Mr. H. R. Schulz
Mr. J. D. Summers*
* cover letter only

SUBJECT Asbestos Audit

Dear Foley:

The audit of plant compliance with the asbestos standard found in OSHA CFR. 1910.1001 is attached for your review. I concur with the findings of the audit team.

I have asked Harvey Schulz to coordinate an implementation team whose charge will be to 1) develop an action plan to correct each deficiency and 2) assist line management in the implementation of the plan.

By copy of this letter I am requesting Bill Barlow, Truman Blum, Dr. Glenn, Ron Ritchie, and Rod Taylor to appoint a representative to serve on this team. I will request the team to complete its action plan prior to the end of this year and to resolve the deficiencies in the first quarter of 1980.

Should you have any further questions regarding this audit, please inform me.

Yours truly,

J. B. Leverton

JBL:ir
Attachment

UCTC 07094

Union Carbide trial exhibit UC-1094: J. B. Leverton to F. S. Provenzano Transmitting the Texas City Plant Asbestos...
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TEXAS CITY PLANT ASBESTOS STANDARD COMPLIANCE AUDIT

RE: OSHA 29 CFR 1910.1001 ASBESTOS

Paragraph	Standard	Deficiencies	Recommendations
(a) Definitions		Not audited.	
(b) Permissible Exposure		Not audited.	
(c) Methods of Compliance	(c) (2) Work Practices - (i) Wet Methods. Insofar as practicable, asbestos shall be halded, mixed, . . or otherwise worked in a wet state.	1. Insulators indicated that wet method was not used in all cases, particularly in inaccessible areas. 2. Contract supervision is lax on this point -- one supervisor was observed and he made no effort to correct any deficiencies. 3. Quantity of water is sometimes deficient. 4. Where small pieces of insulation were needed to be removed, other crafts did so without regard for work practices. 5. In some instances, even though insulators were following procedures, including respiratory, other crafts working hand in hand did not wear respiratory equipment.	1. Provide plantwide training program on hazards of asbestos and recommended work practices. 2. Require supervision to enforce current standards.

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Paragraph	Standard	Deficiencies	Recommendations
(d) Personel Protective Equipment	(d) (2) (i) Air Purifying Respirators. A reusable or single use air purifying respirator, . . ., shall be used to reduce the concentrations of airborne asbestos fiber . . .	1) Construction personnel were observed performing asbestos removal with respirators hanging around their necks.	1) Standardize on single type of air-purifying respirator for both UCC and contractor use.
	(d) (3) Special Clothing: The employer shall provide, and require the use of special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverage. . .	1) Coveralls are ripped and torn; have no pockets so employees cast them anyway to gain access to their pants pockets. 2) Cotton gloves used for removal are also used for other jobs. 3) Some coveralls were noted to be unzipped. 4) No foot or head coverings observed.	1) Provide disposal coveralls and insure proper use for UCC personnel. Contractors shall be required by contract to do same. 2) Job supervisors shall insure that cotton gloves are properly disposed at the end of the job.
	(d) (4) Change Rooms.	1) There are no separate change rooms for insulators who work with asbestos. 2) No separate lockers for work and street clothing. 3) Disposal clothing does not always go to approved landfill with asbestos wastes.	
(e) Method of Measurement	Not audited -- Lab certification requires routine asbestos measurement at referred samples.		
(f) Monitoring		No deficiencies noted.	

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Paragraph	Standard	Deficiencies	Recommendations
(g) Caution Signs and Labels	(g) (1) Caution signs (i). Caution signs shall be provided and displayed at each location where airborne concentrations of asbestos fibers may be in excess of the exposure limits. . .	1) Barricades and warnings are being violated by crafts other than insulators. Most common is by unit operations; some supervision has also been observed violating barricades.	1) Hazards of asbestos should be emphasized to all personnel who work in the plant so they would be less prone to enter a barricaded area. Supervision should enforce these work rules.
		2) Though signs meet minimal OSHA size requirements, they are generally illegible.	2) Large, readable signs should be purchased and made readily available to insulators.
(h) Housekeeping	(h) (1) Cleaning. All external surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers. . .	1) Asbestos removed from pipe racks is often dropped to ground before bagging.	1) Instruct insulators to bag all old asbestos insulations in pipe rack.
		2) Too little water is sometimes used when removing asbestos resulting in airborne concentrations in excess of the TLV.	2) Instruct insulators to more thoroughly wet old asbestos before, during and after removal.
		3) Asbestos has been removed that was not bagged until following day.	3) Instruct insulators to not remove more asbestos that can be bagged during the same workday.
	(h) (2) Waste disposal. Asbestos waste, scrap, bags . . . shall be collected and disposed of in sealed impermeable bags or other closed impermeable containers.	1) Bulldozer in OPDA breaks bags while covering with soil fill.	1) Fill methods should be improved so as to prevent breakage.

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TEXAS CITY PLANT ASBESTOS STANDARD COMPLIANCE AUDIT

RE: OSHA 29 CFR 1910.1001 ASBESTOS

Paragraph	Standard	Deficiencies	Recommendations
(i) Record Keeping	(i) (3) Employee Notification. Any employee found to have been exposed at any time to airborne concentrations of asbestos fibers in excess of the limits . . . shall be notified in writing of the exposure as soon as practicable but not later than five days of the finding.	1) Department heads not fully aware of this provision. There is at least one case in which an over-exposure occurred and was documented to the DH's and notification did not take place within the allotted time.	1) Review requirements of this section with all appropriate management and supervisory personnel.
(j) Medical Examinations		No deficiencies noted.	

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