(1) SFF (2) [illegible] (3) ESP JBL-file

BAKER & BOTTS
ONE SHELL PLAZA
HOUSTON, TEXAS 77002

RECD. OCT 18 1984 WPN

RECEIVED
OCT 11 1984
FSP

G-38,738-1
UNION CARBIDE CORPORATION
(OSHA Citation 84-0705)

October 8, 1984

PLAINTIFF'S EXHIBIT
tabbies
UC-1183

COPY

Ms. Betty-Lynn White
Linde Division
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

Dear Betty-Lynn:

I have enclosed a copy of a subpoena duces tecum requiring Union Carbide to designate an agent to appear at the hearing in this matter and bring the documents listed in the subpoena. You will note that some of the documents which have been subpoenaed are ones which will disclose the amount of shell pressure in the unit at the time that the cooling system was first operated.

I am aware of Lee Rosenthal's contact by Mike Solar and that a lawsuit against Union Carbide now appears to be eminent. We now need to discuss what approach we intend to take toward the ultimate resolution of this matter.

Please call me after you have reviewed the enclosed.

Sincerely,

Ross Harrison

RH:160
Enc.
cc: Mr. Foley Provenzano
Ms. Lee Rosenthal

UCTC 21138

SUBPOENA DUCES TECUM

UNITED STATES OF AMERICA

OCCUPATIONAL SAFETY AND HEALTH REVIEW COMMISSION

1100 Commerce Street, Suite 7B11
Dallas, Texas 75242

To Union Carbide Corporation
Post Office Box 471
Texas City, Texas 77590

Request therefor having been duly made by Robert A. Fitz, an attorney for the Secretary of Labor, United States Department of Labor, complainant herein, *whose address is* 555 Griffin Street, Suite 501, Dallas, Texas 75202,

YOU ARE HEREBY REQUIRED AND DIRECTED TO [illegible] TO DESIGNATE A KNOWLEDGEABLE AGENT TO APPEAR BEFORE THE HONORABLE DEE C. BLYTHE, an Administrative Law Judge *of the Occupational Safety and Health Review Commission,* at in the Exchange Room on the Lobby Level of the Downtown Campus of the University of Houston, 101 Main Street, *in the City of* Houston, Texas, *on the* 25th *day of* October *, 19* 84 *, at* 9:30 *o'clock* a. *m.* *of that day, to testify in the Matter of* Union Carbide Corporation

OSHRC Docket No. 84-0705

And you are hereby required to bring with you and produce at said time and place the following books, records, correspondence, and documents:

(a) The annual financial report, profits-and-loss statement and receipts-and-disbursements statement of Union Carbide Corporation for its most recently ended fiscal year.

(b) The written occupational safety and health program (if any) of Union Carbide Corporation for its Texas City, Texas, plant as it existed on April 13, 1984.

(c) The map of Union Carbide Corporation's Texas City, Texas, plant showing the physical location of the Vinyl Acetate Unit with respect to the rest of the plant.

(d) The building plans and/or blueprints for the Vinyl Acetate Unit at Union Carbide Corporation's Texas City, Texas, plant.

(e) The building plans and/or blueprints for the water chilling unit installed at Union Carbide Corporation's Texas City, Texas, plant on April 13, 1984 by Mobil Air Conditioning, Inc.

(f) The loose leaf book for the Texas City, Texas, plant of Union Carbide Corporation, page 1-9 of which is entitled "Standard Solvents & Intermediates, [CONTINUED ON THE BACK

SDT-2- 13269

In testimony whereof, the seal of the Occupational Safety and Health Review Commission is affixed hereto, and the undersigned, a member of said Occupational Safety and Health Review Commission, has hereunto set his hand and authorized the issuance hereof.

Issued at Dallas, Texas 75242,
this 2nd *day of* October *, 19* 84.

Timothy F. Cleary

NOTICE TO WITNESS.—Witness fees for attendance, subsistence, and mileage, under this subpoena are payable by the party at whose request the witness is subpoenaed. This subpoena should be examined and submitted with the voucher if reimbursement for witness fees from the U.S. Government is claimed.

GPO-347-414

UCTC 21139

QUICK CONNECT (Kamlock Type) FITTING

PRESSURE RATINGS

Metal	Pressure, psig 250	200	150	125	100	75
Cast Iron	NOT RECOMMENDED AT UCC					
Steel	≤ 2"	3"	-	-	4"	6,8"
Stainless	≤ 2"	3"	-	-	4"	6,8"
Monel	≤ 2"	3"	4"	-	6"	8"
Malleable Iron	-	≤ 2"3	3"	4"	6-8"	-
Brass	≤ 2"	-	-	3"	4"	6,8"
Aluminum	≤ 2"	-	-	3"	4"	6,8"

NOTE:

1. May be used only for pneumatic conveying of solids at UCC.
2. Data from Seal Fast, Inc. Catalog
3. Not approved for metal chemical transfer hose since this down grades the rating below these given in Plant Procedure I-F-2.

UCTC 21140

Union Carbide trial exhibit UC-1183: Ross Harrison (Baker & Botts) to Betty-Lynn White Enclosing OSHRC Subpoe...
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asbestosclaims.law/library/16357/3