S-H Procedures Manual
Vol. 4 EP-OH.

10-81

PLAINTIFF'S EXHIBIT

UC-1691

ASBESTOS PROCEDURE

I. PURPOSE:

To protect Plant personnel from the danger of breathing asbestos fibers released from friable (dusty) asbestos containing materials.

II. DISCUSSION:

Inhaled asbestos fibers are considered to be carcinogenic (cancer causing). Asbestos containing material in the Plant includes old in-place insulation, gaskets, packing, transite, and asbestos cloth. No new asbestos insulation material will be purchased or installed. Efforts will be made to find alternate non-asbestos containing material to replace any asbestos material capable of emitting fibers or dust. Materials in which the asbestos is secured by a bonding agent or coating are less of a hazard unless they are sanded or drilled.

III. RESPONSIBILITIES:

A. SHARE:

1. Advise maintenance of disposal methods and write trip tickets for off-site asbestos disposal.
2. Conduct air monitoring in the area of asbestos insulation removal.
3. Notify Texas Air Control Board ten days before removal of more than 80 meters of asbestos pipe insulation or 15 square meters of insulation on a boiler, reactor or similar equipment. *F

B. OPERATING DEPARTMENTS:

1. Responsible for proper and safe handling of any asbestos insulation, packing, gaskets or other asbestos containing material present in the unit.
2. Notify SHARE Department of intended asbestos insulation removal. It must be reported to the Texas Air Control Board Regional Administrator ten days prior if it exceeds 80 meters of pipe covering or 15 square meters of boiler or reactor covering. *F

BRA 0831

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III. RESPONSIBILITIES (Cont'd)

C. MAINTENANCE:

1. No asbestos containing insulation will be installed in the Plant.
2. Follow maintenance asbestos procedure for removing old asbestos insulation. Essentially, don't make dust. Only handle it wet. Don't drop insulation or insulation covered members. Ref. Maintenance Procedure #MF-II-6.2).
3. Personnel doing asbestos insulation removal will wear protective clothing and respirators.
4. Seal all asbestos wastes (wet insulation) in plastic bags, label with asbestos warning labels, and store in asbestos holding area (Dumpsters north of insulation shop.) *R
5. When there is sufficient asbestos waste to make a load, contact SHARE Department for disposal instructions. An industrial waste shipping control ticket will have to accompany each load leaving the plant.

D. STORES:

1. No asbestos containing insulation will be purchased.
2. Efforts will be made not to purchase other asbestos containing materials that are capable of emitting dust and fibers.
3. Store all asbestos packing, gaskets, etc., in tied plastic bags where practical.
4. Label shelves and storage areas where asbestos materials are kept with asbestos warning label.
5. All clean-up in asbestos material area will be done with a vacuum sweeper or under wet conditions to avoid dust in the air.
6. Waste asbestos material such as gasket material, ends of packing rolls, vacuumed dust, etc., will be sealed in plastic bags, labeled with asbestos warning label and stored in asbestos waste storage area.

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cc : N.J. DUFRENE

BFI Waste Systems
BROWNING-FERRIS INDUSTRIES

September 30, 1982

Mr. Bill Davies
Union Carbide Corp.
Coatings Material Division
P.O. Box 3370
Brownsville, Texas 78520

Dear Bill,

I have discussed the routine collection of asbestos along with solid waste at your service location with Bill Clay, Texas Dept. of Health, Region 8 Solid Waste Division, Larry Smith, Texas Dept. of Water Resources and Mr. Torres Texas Air Quality Control.

I explained to them Union Carbide does not generate more than 20 cubic yards per year and the asbestos is wet and placed in plastic bags for disposal.

They do not have problem with this method of collection, you will not have to separate the asbestos.

Sincerely Yours,

Al Young
District Manager

cc: Bill Clay, P.E. T.D.H. Solid Waste Division
Larry Smith - Texas Dept. of Water Resources
E. Torres - Texas Air Quality Control

RIO GRANDE DISTRICT - SOLID WASTE SYSTEMS
STAR ROUTE BOX 6 • BROWNSVILLE, TEXAS 78521 • (512) 831-9361

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