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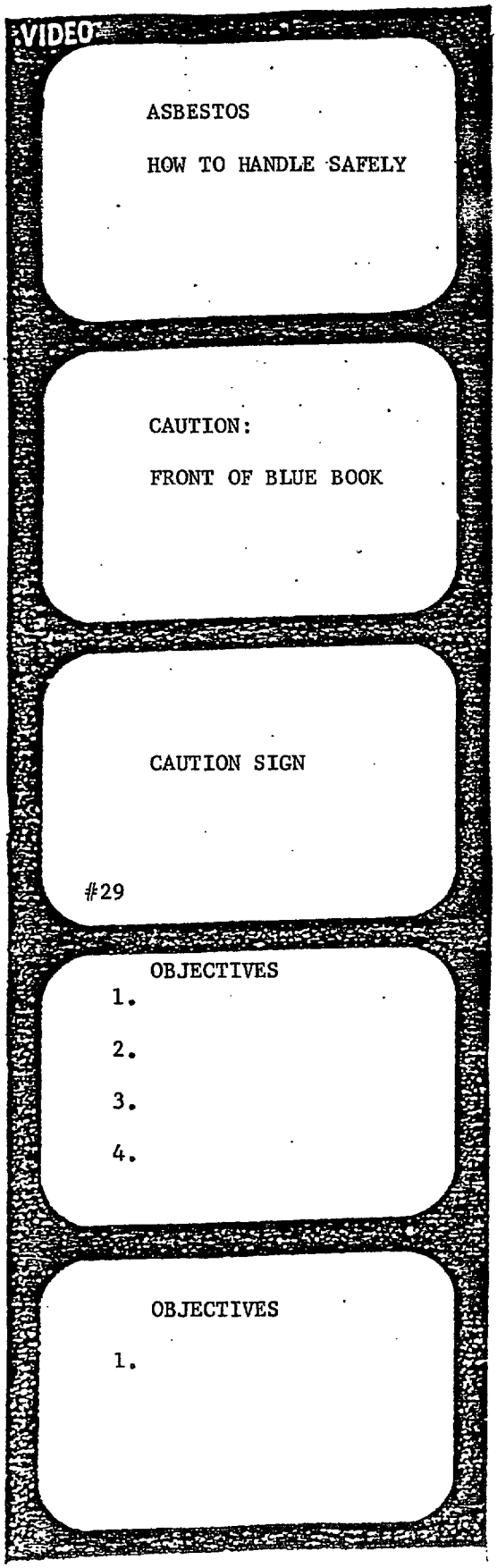
PLAINTIFF'S EXHIBIT

UC-1752

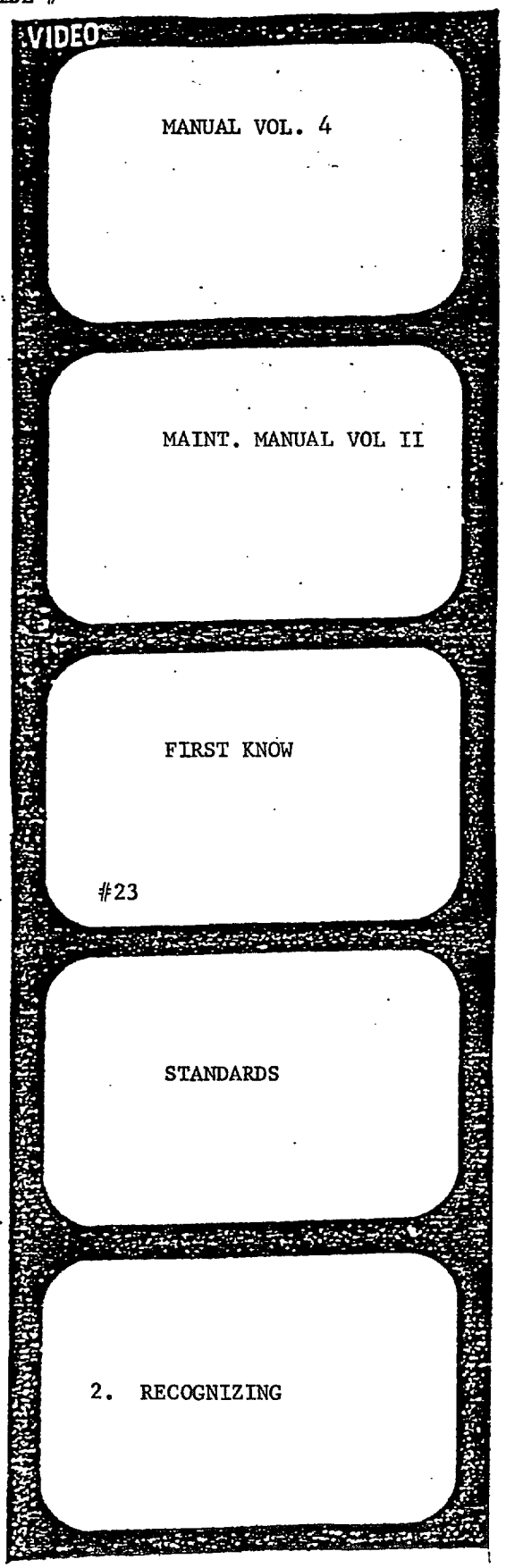
SLIDE #

	VIDEO	AUDIO
1	UCC LOGO	
2	GATE ENTRY SIGN	At the Union Carbide Brownsville Plant good safety and health are very important goals. But we need your cooperation to help us maintain this * outstanding safety record.
3	SAFETY RECORD FROM VEHICLE	It is the first thing we see upon entering the plant at Gate #2 and it serves as a daily reminder, *
4	CLOSE UP	that we must continue to be constantly alert to maintain it and to surpass it. We feel that this safety philosophy is so important that on leaving *
5	PIGGY BANK SIGN	the plant we are reminded to take it home with us, and to encourage our families to practice it. *

BRF 0346

SLIDE #	VIDEO	AUDIO
6		The SHARE Department and the Occupational Health group presents this training module on the safe handling of asbestos. *
7		Inhaled asbestos dust fibers are considered to be hazardous to your health. It may cause *
8		lung disease, cancer of the chest AND ~~or~~ abdominal lining or cancer of the respiratory system. *
9		Our plant asbestos safety procedures are designed to protect you from these hazards of asbestos, through these 4 objectives. *
10		This training module is itself a means of informing you along with these other sources. *

BRF 0347

SLIDE #	VIDEO	AUDIO
11		The Union Carbide Safety and Occupational Health Procedures Manual, Volume 4, Procedure No. 2.35. *
12		and the Maintenance Department Procedures Manual Volume II Procedure No. MF-II-6.2 *
13		In addition you should also know the OSHAct safety standards dealing with asbestos. PAUSE *
14		These standards are specifically set in order to protect your health, and we help you maintain these low levels by taking samples around your work area to insure that they are not exceeded. PAUSE *
15		Our next objective is to recognize materials that contain asbestos. Asbestos is such a useful mineral that there are almost 3,000 products in which it is used today. Some in use at our plant include *

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ACL Doc 16825 · Page 3 of 11 asbestosclaims.law/library/16825/3

SLIDE #	VIDEO	AUDIO
16	GASKETS 4 SLIDES	Gaskets of various types, sizes, shapes, and colors.*, *, *, *
20 ~~17~~	PACKING 3 SLIDES	Packing materials also in a variety of sizes, ~~and~~ shapes. + COLORS *, *, *
Need ~~18~~ 23	TRANSITE 3	Transite which is very useful for wall siding, roofing and other construction.* It should be noted that gaskets, packing and transite are not as hazardous because the asbestos is secured by a bonding agent or coating,* but they can be hazardous when sanded, cut or drilled.*
26 ~~19~~	WRAPPING TAPE 2 SLIDES	Wrapping tape which is very useful because of its insulating properties* and ease of application.*
28 ~~20~~	FIRE BLANKETS AND WELDING SCREENS 3 SLIDES	Fire blankets and welding screens which prevent fires and avoid exposures to welding light.*, *, *

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ACL Doc 16825 · Page 4 of 11 asbestosclaims.law/library/16825/4

SLIDE #	VIDEO	AUDIO
31 NEED ~~21~~	BRAKE SHOES	Brake shoes which prevent overheating of brake drums. ~~Care should be taken not to breath the dust when working on brakes~~. *
~~22~~ 32	OLD INSULATION	and most important of all is the old implaced insulation which is still in existence in various parts of the plant. ~~But~~ *
33 ~~23~~	NEW INSULATION 2 SLIDES	BUT no new asbestos insulation material will be purchased or installed. Efforts will be made to find alternate materials,* to replace those that contain asbestos and are capable of emitting dust or fibers.*
35 ~~24~~	OLD INSULATION	but the old insulation is still here and on occasion it must be disturbed for needed repairs of equipment and it is during these times that special handling is required.*
36 ~~25~~	3. HANDLING	It is through the proper handling of these materials that asbestos hazards can be avoided.*

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SLIDE #	VIDEO	AUDIO
37 26	BETTER WORK PRACTICES	At the Brownsville Plant these work practices are part of our standard operating procedures. You will find that both manuals mentioned earlier, contain these same recommendations. *
38 27	CUTTING AND LOWERING PIPE #16	Note that before cutting this asbestos insulated pipe it has been tied with a rope to prevent it from falling to the ground and creating asbestos dust. *
39 28	LOWERING PIPE #17	Here, properly suited workers are ready to receive the pipe. *
40 29	LOWERING PIPE TO GROUND #18	so that they can begin removing the insulation when the pipe is on the ground. *
41 30	REMOVING FROM PIPE	Once the insulation has been thoroughly wetted, they start removing it, adding water as needed. *

BRF 0351

SLIDE #	VIDEO	AUDIO
42 ~~31~~	BAGGING #20	As soon as the insulation is removed it should be bagged in the special plastic bags available in Stores for this purpose. *
43 ~~32~~	BARRICADE 2 SLIDES	This is another example of our procedures, a barricade ~~and~~ WITH signs posted. *, *
45 ~~33~~	CAUTION SIGNS AND LABELING #22	This is another important part of our procedures. Note that signs are required only for those products which contain asbestos fibers which are not bonded or contained. PAUSE *
46 ~~34~~	DUST SIGN	This is a typical sign used around the plant when working with friable asbestos. PAUSE *
47 ~~35~~	TAG	A tag which can be used to label material which contains friable asbestos. PAUSE *

BRF 0352

SLIDE #

VIDEO	AUDIO
48 ~~36~~ DUST MASK	You must remember to use a dust mask when working with asbestos insulation. *
~~37~~ 49 VACUUM CLEANER	and use a vacuum cleaner or wet clean the area; never use a broom or brush while asbestos is dry and never blow clean with air. *
~~38~~ 50 4. DISPOSING	This final objective gives the simple procedures which must be followed in order to properly dispose of asbestos. *
NEED ~~39~~ 51 BAGGING AND TIEING 2 SLIDES	Once the asbestos is in the special plastic bags, they must be tied off and the special stick-on label placed on it in an easily visible place. *, *
53 NEED ~~40~~ DISPOSING OF SUIT AND MASK 2 SLIDES	Don't forget that your disposable suits and masks must also be placed in the disposal bags, but it should be done at the end of the job and should be the last items to enter the bag. *, *

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ACL Doc 16825 · Page 8 of 11 asbestosclaims.law/library/16825/8

SLIDE #

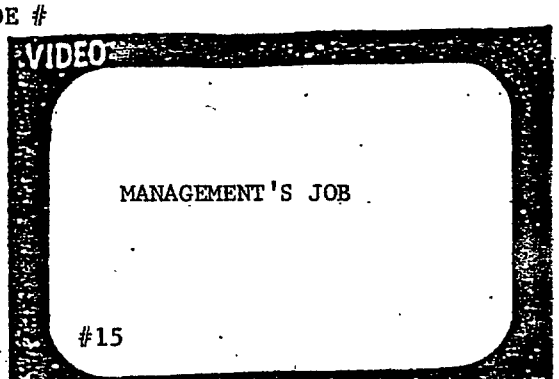
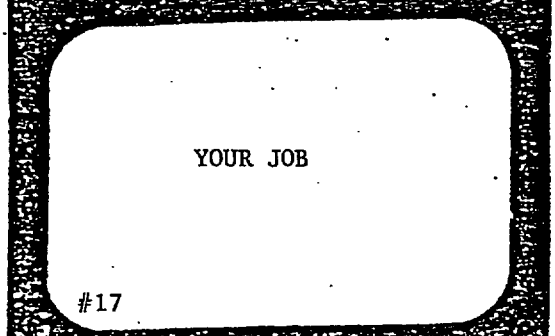
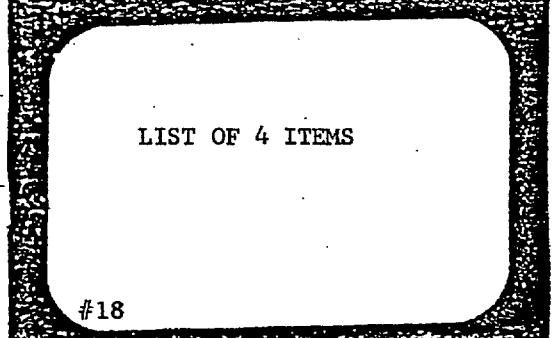
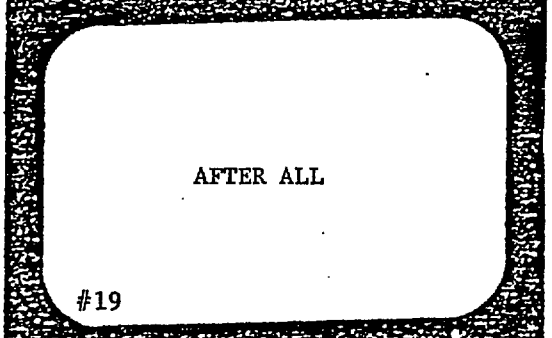
VIDEO	AUDIO
55 ~~41~~ PLACING BAG IN DUMPSTER	The bags must be carried to this specially designated dumpster, located on the N. W. corner of the insulation shop at Building 625. *
56 ~~42~~ INSIDE OF DUMPSTER 2 SLIDES	This dumpster is the holding place in the plant for asbestos materials until final disposition by the EP Department. *, *
58 ~~43~~ THINGS YOU MUST DO #1	To summarize, here are some things that must be done by <u>you</u> in order to protect your health. *
59 ~~44~~ KNOW HAZARDS #2	Find out, the hazards that may be encountered on your job, the exposure potential, the available controls, and the protective equipment which is at your disposal. *
60 ~~45~~ WEAR AND MAINTAIN #3	When required to wear protective equipment, DO NOT take good care of it, don't abuse its design limits, remember it is for your own protection. *

BRF 0354

SLIDE #

VIDEO	AUDIO
46 61 PRACTICE GOOD HOUSEKEEPING #4	With asbestos it is very important to practice good housekeeping. Use the best equipment available and clean the area thoroughly; if there is no asbestos around then no dust will be created that may harm you. *
47 67 REPORT HAZARDOUS CONDITIONS #5	If you see anything out of the ordinary, or suspicious, report it to your supervisor. This is the best way of correcting hazardous conditions. *
48 63 CONSIDER YOUR HEALTH #6	Be constantly aware of your own health, don't expose your body to any unnecessary stress, remember that cigarette smoking by itself causes cancer. * PAUSE
49 64 S O O O WE CAN REDUCE #13	50 If everyone does his job, the hazards of asbestos can be minimized so that there will be no danger when working with it. *
50 65 GOVERNMENT'S JOB #14	These are the things the government is doing to guard your health. They have set an asbestos standard, they do enforce it, and they keep us up-to-date on revisions and changes. *

BRF 0355

SLIDE #	VIDEO	AUDIO
66 ~~51~~		These are the things your employer does to protect you. He looks for and uses the best control methods. He provides all the necessary protective equipment and he informs you of the dangers and procedures to follow. *
67 ~~52~~		But you also have a part to play and your job is probably the most important, because neither the government nor your employer can protect you unless you yourself want to be protected. * So you must learn
68 ~~53~~		to recognize the different types of materials in the plant that contain asbestos. How these materials can be handled safely. How to take care of your protective and control equipment. And any other work practice which is designed to protect you. *
69 ~~54~~		After all you are number 1, so take good care of yourself, both you and your family will appreciate it. *
		

BRF 0356