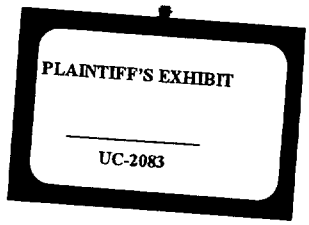
WV-0201 #26



ASBESTOS INSULATION ABATEMENT

SOUTH CHARLESTON PLANT

4/16/87 STATUS

CURRENT ACTIVITIES

- PROJECT MANAGER ON BOARD
- TRAINED AS "COMPETENT PERSON"
- CRITERIA ESTABLISHED FOR LABELLING/PRIORITIZATION
- SPENT≈ $100M THRU APRIL

NEXT STEPS

- SET UP HOLDING ACCOUNT
- DEVELOP WOR FOR $900M PROJECT
- DEVELOP WORK SCHEDULE BY 5/1
- ISSUE FINAL DRAFT OF ASBESTOS HANDLING/REMOVAL PROCEDURE
- INCLUDE KNOWLEDGEABLE PERSON ON WEEKLY "SHARE" AUDITS

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ACL Doc 17104 · Page 1 of 10 asbestosclaims.law/library/17104/1

ASBESTOS INSULATION REMOVAL PROJECT

OBJECTIVE OF THE PROJECT

The objective of this project is to minimize hazards of airborne asbestos in the South Charleston Plant.

JUSTIFICATION

The justification ~~of~~ for this project is Occupational Health. The present OSHA Asbestos Standards, 1910.1001, specifies two fibers/cc as the maximum allowable exposure over an 8-hour period.

ALTERNATIVES TO REMOVAL

Continue operations with the present asbestos insulation. Personnel may be exposed to airborne particulate asbestos.

TECHNICAL RISK

There is no technical risk associated with this project.

OCCUPATIONAL HEALTH CONSIDERATIONS

This project will correct an occupational health concern by removing asbestos insulation from equipment, lines and facilities. When the insulation is being removed, safety and health guidelines will be followed which includes: installing rope barricades and clearing the area of plant personnel; posting of warning signs; proper bagging and disposal of insulation; and monitoring of surrounding work areas. In addition, assuring that contractor personnel adhere to guidelines such as: wet clean-up; wearing of appropriate respirators; wearing and disposal of proper clothing.

ENVIRONMENTAL PROTECTION CONSIDERATIONS

This project will be in compliance with all applicable OSHA and EPA Regulations. The U. S. Environmental Protection Agency will be notified that the removal of asbestos insulation could occur at the South Charleston Plant.

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ACL Doc 17104 · Page 2 of 10 asbestosclaims.law/library/17104/2

PROJECT PLAN

Initial implementation of this project authorized the removal of asbestos insulation from idle equipment and lines only, as specified in approved "838 Work Order Requests". These areas included:

- Specialty Chemicals
- Middle Island
- Polyols
- Upper Island
- Specialty Catalyst
- Solvent Vinyl Resins

Subsequent "838 and 930 WOR's" have also been approved for removal and replacement of asbestos and temporary insulation at the Oxide Adducts Unit.

The work associated with this project will be performed by outside contractors. Powerhouse Equipment Company is currently on-site performing this activity. Work priorities and schedules will be developed based on the criteria contained in the attached "Asbestos Project Criteria". A preliminary "Schedule for Asbestos Removal" is also attached which reflects individual job status. Through 1987, approximately $72,000 has been spent on this project. Projected costs to be incurred as a result of this project scope are anticipated to run about $5 million over the next 3 years.

In order to effectively manage this project, a single individual has been assigned as the "Insulation Contract Coordinator" (Herb Price x2953). The attached job description reflects the initial attempt to define the activities associated with this position. During the next few weeks, Herb will meet with each department head (or designated unit contact) to review individual department requirements in order to develop a composite list of the plant's critical few.

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ACL Doc 17104 · Page 3 of 10 asbestosclaims.law/library/17104/3

ASBESTOS PROJECT CRITERIA

1. Analytical tests are used to identify the composition of insulation materials.

2. Work priorities and schedules are developed based upon:

   - o verification of the insulation as asbestos
   - o degree of deterioration of the insulation
   - o interior locations with greater exposure potential are given priority over exterior locations with low exposure potential
   - o scheduled or pending shutdowns are considered
   - o potential for interference with other work activities, i.e. paint program
   - o efficient utilization of the contractor resources (minimize skipping around)

3. All insulation material identified or applied under this program is clearly labeled for future reference.

4. Records are maintained documenting removal and repair activities, quantities of asbestos insulation removed, and associated costs.

5. All applicable Federal and State regulations are followed.

6. A schedule is developed projecting 30-day work activity and is updated every two weeks.

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ACL Doc 17104 · Page 4 of 10 asbestosclaims.law/library/17104/4

JOB DESCRIPTION

CONTRACT COORDINATOR - INSULATOR

The following list of job activities represents the initial attempt at defining a new position in the Maintenance Department Contract Coordinator Group. This job description will be reviewed and updated as necessary no later than July 1, 1987.

1. Receives all work requests for insulation work to be done by contractors. Generally, the incumbent should receive these requests from the Area Maintenance Superintendent. This will ensure the Area Superintendent concurs with the decision to sub-contract the work and that he knows what work is being done in the area.

2. Establishes priorities for contractor usage. A schedule will be developed listing the contractor insulation work that is planned. The schedule will cover a 30-day period and will be updated every two weeks.

3 Enforces safe work practices with the contractors. Monitors contractor work for compliance with all Federal, State, and Plant Safety/Health regulations.

4. Ensures that all required testing and analysis is performed to clearly establish insulation material as being either asbestos or non-asbestos.

5. Ensures that all required personnel monitoring and area sampling is conducted.

6. Recommends/decides removal vs. repair and encapsulation.

7. Assists in developing a recommendation to enable clear identification of insulation material as to its asbestos or non-asbestos composition. This identification will apply to newly installed insulation as well as insulation which is tested and repaired. Once a method to identify is agreed upon, the incumbent ensures that identification is applied.

8. Prepares estimates as needed to aid in notification by EP personnel to Federal and State regulatory agencies.

9. Decides when special work hours are appropriate for the contractors.

10. Verifies all contractor time and material changes.

11. Ensures that valid account charges are used. Monitors and reports costs as appropriate to ensure meeting objectives.

12. Monitors contractor productivity. Takes or recommends action as appropriate.

13. Prepares and distributes periodic reports documenting progress of the Asbestos Insulation Program.

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ACL Doc 17104 · Page 5 of 10 asbestosclaims.law/library/17104/5

Union Carbide trial exhibit UC-2083: South Charleston Plant Asbestos Insulation Abatement: 4/16/87 Status and Re...
ACL Doc 17104 · Page 6 of 10

Schedule For Asbestos Removal

WK Ending 4/17/87

Location / Complete	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Complete 216	201281 ✓	Patch & Seal Tank 273 Asbestos		3-27-87		28
Complete 157	193735 ✓	strip 48' ¾" Pipe Covering. Asbestos		4-10-87		
Complete 152	203321 ✓	strip 36' ½" pipe Covering Asbestos		4-10-87		
Complete 147	195337 ✓	strip 40' 2" Pipe Covering Asbestos		4-9-87		
Complete 133	1906H2 ✓	strip 22' 1½" Pipe Covering Asbestos.		4-13-87		
Complete Rack Bld 122	200193 ✓	Remove Approx 30' double layer insulation (Exp. Loop) in Rack & Reinsulate		4-13-87		34

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WK Ending 4/17/87

Schedule For Asbestos Removal

Location	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Bldg 216	193197	Reinsulate Tank 643 & 644, Blast & Paint per Est. # 2H334, scaffold & Material.			760	
101	193795	Strip Asbestos in #101 6 pcs 12" Flgs., 18 pcs 8" Flgs 12' 1" pipe covering. 1-8" Pump.			96	
102	188681	Strip 175 L.Ft. 1" piping				
216	201306	Remove Asbestos in Bldg 103 & 216 Area. 24' Lin. Ft. 12x12" Duct, 231' 5" Coundit				
216	201307	Strip Insulation and re-insulate Tank 661/662 per Est. # 23000				
Complete 303	200151	Repair & Remove Ins. in Bldg 303. Drumming Area.		3-30-87 Worked WK Ends.		131 M.H

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ACL Doc 17104 · Page 7 of 10
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asbestosclaims.law/library/17104/7

Schedule For Asbestos Removal

WK End 4/17/87

ocation	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Bldg 191	190894	Strip & Seal Asbestos Hanging from Lines So. 191 Press Area 180 M.H. to strip & seal Insulation in Rack.			180 M.H.	
Bldg 75	199793	Remove Asbestos inside of Bldg 75 & Replace & Lines west of Bldg. 1172 Lin ft.	4-17-87		976 To Strip 1172	
Bldg 36	201091	Strip Back 1' each way to dry Insulation & Reinsulate Eth. Oxide Line Lower Island			404	
N. Chas	190895	Mis. Insulation at Bulk Term. Disb. N. Chas. Approx. 500 M.H. to strip, Patch Insulation, & Insulate Lines & Eq.	4-13-87	5-15-87	500	
Bldg 323	198912	Remove Asbestos & Replace N. W. Corner No. 7 Dock Approx 40'	4-7-87	4-17-87	L.H	
Bldg 216	193196	Remove Asbestos from Tank C43 & C44 & Ass. piping. Remove From from C43 & C44. 90' piping 2400 sq ft Asbestos. Approx. [illegible]	4-20-87	5-15-87		

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ACL Doc 17104 · Page 8 of 10
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Schedule For Asbestos Removal

WK Ending 4/17/8

Location	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man H. Expe
Bldg 36	838-2401	Reinsulate #4 & #5 Reactor & piping inside enclosure 1900 sq. Ft. Reactors 1670 Lin. Ft. Piping	On Hold	On Hold	1406	
Bldg 36	930-2030	Strip. #4 & #5 Reactors & piping inside enclosure 1900 sq Ft. Reactors 1670 Lin. Ft. Piping	3-23-87 On Hold	On Hold	2206	326
Bldg 109	192731	Remove asbestos on 1st Flr & Replace Approx. 200' Lin Ft.	3-17-87 Stripped			142
Bldg 156	195339	Strip asbestos on Tanks 4620, 5051, 5052, 5115, 4041 Remove ins. on piping inside & East of Bldg. 1486 sq ft. 1901 Lin. Ft. Piping	4-1-87	6-15-87	2552	81
Bldg 42	192730	Reinsulate Eth. Oxide Lines #42.	3- -87			88
Bldg 42	201583	Asbestos Removal Bldg 42 & Tank Farms. 1530	4-1-87			21

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ACL Doc 17104 · Page 9 of 10
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asbestosclaims.law/library/17104/9

4-17-87

Schedule For Asbestos Removal

ocation	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expende
Bldg 151 Complete	192H6H ✓	strip Asbestos 40' Lin. Ft. 4" Pipe Covering		4-10-87		
151	199H5H ✓	strip Asbestos, 12' ½" P.C. 3' 1" P.C. 4' 16" Piping			24	
west 36	201116 ✓	strip Asbestos from Evaporator in field. 135 ~~sq~~ ft.			32	
Complete 146	200469 ✓			4-10-87		80
196	192682 ✓					106

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ACL Doc 17104 · Page 10 of 10
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asbestosclaims.law/library/17104/10