PLAINTIFF'S EXHIBIT

UC-2093

UNION CARBIDE CORPORATION
Internal Correspondence — Texas City Plant

November 4, 1986

To: M. D. Lindsey

Subject: OSHA Asbestos Standard Implementation

Several areas of concern were identified by the committee during the process of reviewing the revised OSHA asbestos standard and considering its impact on the Texas City Plant. These generally fall outside the scope of the charter given to the committee and are listed here for your consideration.

1. There appears to be a need for communication with the turf department heads to encourage them to continue the emphasis on removal/renovation of asbestos containing insulation. Results from the initial effort under Joe Schultz have been inconsistent and to a large extent have been dropped from the budget for 1987. The 3 to 5 year plan adopted in 1985 should be maintained.
2. It is apparent from administering the notice requirements of the existing EPA regulations contained in the Plant Procedure on asbestos, that the plant is largely unaware of the requirement for advance notice to the agencies involved. This has placed a burden on the insulation group to double check each job to assure that required notices were timely provided prior to starting an asbestos renovation/removal.
3. The departments that have complied with the notice provisions in the Asbestos Plant Procedure have consistently given too narrow a time window for the work to be done which has placed an additional burden on the insulation group. Any time frames set for insulation removal or repair should be set with the cooperation and agreement of the maintenance organization.

In general it is the recommendation of the committee that an effort be made to inform all employees of the new asbestos procedure requirements emphasizing the notice required to the regulatory agencies and highlighting the increased costs that will be associated with future asbestos renovation/removal. The insulators are available to provide estimates on manhours required for specific jobs, and to assist in identifying priority work.

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