PLAINTIFF'S EXHIBIT

UC-2107

UNION CARBIDE CORPORATION

1300 HERCULES AVENUE, SUITE 202

HOUSTON, TEXAS 77058

8 August 1986

Attached Distribution List

SUBJECT: RECOMMENDED POLICY ON USE OF ASBESTOS IN THE WORKPLACE

Attached is the draft of the Asbestos Policy which will be recommended to the Manufacturing Council. At this time it's expected to be on their late August agenda.

This policy reflects the impact of a reduction in acceptable exposure levels from 2.0 to 0.2 fibers/cc on a 8 hour TWA, which took effect July 21, 1986. This change is listed in the June 20, 1986 Federal Register.

If you have comments or would like to discuss this policy further it's not too late to let me know.

Thanks again for all of your earlier feedback.

Larry

Larry E. Calvert

LEC:ka
Attachment
6240K

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ACL Doc 17125 · Page 1 of 6 asbestosclaims.law/library/17125/1

WV-0204 #61

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UCC 006441

UNION CARBIDE CORPORATION
ENGINEERING, MANUFACTURING, AND TECHNOLOGY SERVICES DIVISION
P. O. BOX 8361
SOUTH CHARLESTON, WEST VIRGINIA 25303

M E M O R A N D U M

August 6, 1986

TO: Mr. L. E. Calvert
Mr. S. W. Clark
Mr. G. B. Elder
Mr. R. W. Engle

COPY: Mr. J. E. Sanders

FROM: C. C. Neely

SUBJECT: Proposed Policy re Use of Asbestos
C&P Operated/Hosted Facilities

Attached is the latest version of the subject document as discussed in our brief meeting yesterday morning. Please pass along any comments you might have to me. As discussed, we may decide to revise the wording of the Purpose/Background portion as a result of Stan's attendance to the asbestos substitute gasket and packing materials seminar in Houston.

C. C. Neely

CCN/gmp

Attachment

2073W

UCC 006443

D R A F T 8/6/86

CHEMICAL AND PLASTICS (C&P) RECOMMENDED POLICY

SUBJECT: USE OF ASBESTOS-CONTAINING MATERIALS(1) IN THE WORKPLACE

PURPOSE/BACKGROUND

The Corporate Charter (1.1) contains the following commitment to employees:

> "To provide working conditions, programs of training and education, and persistent review and appropriate modification of facilities and practices to protect the health and safety of employees."

It also contains a social commitment to conduct business "in accordance with all the applicable national and local laws and regulations."

As a result of available evidence that airborne asbestos in the occupational environment had proven to be carcinogenic in man, all C&P Insulation Standards were revised in 1976 to specify only asbestos-free insulating materials; and new or replacement installations of these materials have subsequently been selected accordingly. Additionally, a Safety/Health Standard designated SH-256 was prepared covering the safe removal and handling (includes disposal) of asbestos-containing insulating material during renovation and demolition. The requirements of this Standard equal or exceed those of current applicable government standards.

OSHA's rulemaking efforts relative to asbestos usage in the workplace are mired in controversy. Hearings on the latest EPA proposal which includes the phaseout of all asbestos over a ten-year period are now in progress. The responsible EPA Deputy Director states that two lists of actions are included in the proposal: one identified as an "Immediate" list and the other as a "Later" list. Neither asbestos-containing gasket, packing nor material already in place are on the "Immediate" list. No peer company that we are aware of has a target date for removal of existing asbestos-containing insulation, or discontinuance of use of asbestos-containing gaskets and packing.

Consistent with the aforementioned commitments, C&P has concluded that positive actions relative to asbestos-containing gaskets, packing, and existing insulation should be taken.

(1) "Asbestos-containing materials" include but are not limited to insulation, gaskets, packing, and building materials.

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ACL Doc 17125 · Page 4 of 6 asbestosclaims.law/library/17125/4

POLICY

Except as otherwise provided by applicable law, Chemicals and Plastics Group will:

Continue to phase out the use of asbestos-containing materials:

- Asbestos-containing insulation shall be replaced with asbestos-free materials as required to maintain structural and functional integrity.
- No asbestos-containing materials shall be purchased after January 1, 1989.
- C&P approved practices shall be employed for the identification, removal, modification, and/or disposal of asbestos-containing materials.
- Evaluation of asbestos substitute materials shall include consideration of health effects as well as suitability for intended service and cost.
- A variance approval procedure shall be employed to cover consideration of uncommon circumstances. Approval must always include endorsement of C&P HS&EA management.

SCOPE

This recommended policy applies to all C&P operated/hosted facilities. Other components of the Corporation will be apprised of its content.

DELEGATION

The assignment of duties and authority to carry out the policy defined herein is delegated as follows:

- To Central Engineering Department

  Develop and maintain engineering standards covering:

  Identification of asbestos-containing materials

  Removal, modification and/or disposal of asbestos-containing materials

  Use of asbestos-substitute materials,

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8/6/86

D R A F T

- To Site Management

  Implement policies and practices for the identification, removal, modification, and disposal of asbestos-containing materials.

- To C&P SHARE

  Audit regulations and ensure that the regulations are complied with.

C. C. Neely/gmp

2073W

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ACL Doc 17125 · Page 6 of 6 **asbestosclaims.law/library/17125/6**