PLAINTIFF'S EXHIBIT

UC-2115

1. SPE - fyi
2. JFD

UNION CARBIDE

INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION P O BOX [illegible] SOUTH CHARLESTON, WV 25303

SILICONES AND URETHANE INTERMEDIATES

SOUTH CHARLESTON PLANT

To (Name) R. G. Link

Division

Location

Area

Date July 26, 1985

Department/Dept.

Area

Subject Asbestos Insulation

Copy to J. R. Dean
L. E. McClure
G. F. Painter
L. W. Phair
S. Rossi
T. G. Swanson

I have followed up on our discussion with regard to asbestos insulation with Corporate HS&EA. The corporation has no specific requirements for removing asbestos other than government regulations are met. There are no government regulations for industry that asbestos should be removed nor when it should be removed. The regulations only specify exposure limits and these limits can be met by enclosing or sealing asbestos.

Asbestos programs were checked at Seadrift and Institute. Their programs are similar to ours, the difference being in emphasis:

- Where insulation is bad (a major tear or the barrier off) the asbestos is stripped and replaced a segment at a time.
- Any maintenance that requires removing insulation to accomplish the work would automatically include stripping and replacing asbestos.
- A small tear would require an evaluation of the insulation's condition as to whether it would be sealed or stripped and replaced.
- As long as the insulation is in good shape, leave it alone.
- When repairs are made the insulation material is identified.
- Documentation is maintained on what has been done and records of air sampling during removal retained.
- Costs are charged to the unit as expense.
- Institute budgeted in 1985 by department for asbestos removal and maintenance. The total plant figure was $500 - $750M.

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Proposal for South Charleston

- Define and more rigidly control insulation repairs. The decision to repair, replace or strip, etc., to be made by one person in Maintenance. Work done is well documented.
- For 1986, budget by department for insulation, upgrading only equipment in use. Work with zone foreman to estimate cost.
- All idle and surplus equipment be stripped of asbestos and the cost charged to an 838 account. The work to be contracted.
- Charge all cost to expense.

W. E. Ballard

WEB/kq

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