PLAINTIFF'S EXHIBIT

UC-2116

D R A F T - 4/25/86

SHORT TERM ASBESTOS INSULATION PLAN
SOUTH CHARLESTON PLANT

Recommendation:

Repair or replace deteriorated asbestos insulation on piping and equipment.

Strategy:

1) Utilize information from the plant asbestos insulation survey and unit walk-through inspections to identify highest priority areas.
2) Notify EP Department of proposed schedule of asbestos insulation removal.
3) Utilize supplemental contractor support for identified blocks of work, starting with a fairly small crew and then staffing up as experience and ability are demonstrated.
4) Target for completing highest priority repairs by 12/31/86, estimated to represent 30M manhours of work ±40%, or about $750M.
5) Continue to utilize 838 projects for removal of asbestos insulation from idle equipment in preparation for demolition.

Issues:

1) PR work within the plant to communicate that there will be an increased level of activity in this area and that proper work practices must be followed, including respect for barricaded areas, etc.
2) Total elimination of asbestos insulation vs. encasement in metal jacketing where possible.
3) Labelling of interfaces between asbestos/non-asbestos insulation.
4) Increased trucking activity in support of the asbestos insulation removal work.

J.R.Dement/kq
2637X

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cc for JKC

Comments by 3/27 7:30 a.m.

D R A F T

Y AND ORGANIZATION

N PLANT

Strategy

The overall strategy is to remove and repair or replace all asbestos insulation at the Charleston plant in accordance with the Asbestos Insulation Standard attached. The following are key parts of this strategy.

1. Continue work on the plant asbestos insulation survey. This survey is documenting the location and condition of asbestos insulation, including whether it can be stripped, repaired, or must be reinsulated. A cost estimate (±40%) is being developed for each segment of work. The survey should be completed by 4/30/86.
2. Continue work on the two approved 838-type projects for asbestos insulation removal from idle equipment. The units affected are Specialty Chemicals/Specialty Catalyst, MICC, UICC, Polyols, and SVR.
3. Continue to make "emergency" repairs as needed or identified and also strip asbestos insulation and reinsulate as part of identified maintenance activities. The insulator group will provide the customer department with a cost estimate and schedule for any large block of work prior to beginning the job.

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D R A F T

ASBESTOS INSULATION STRATEGY AND ORGANIZATION

SOUTH CHARLESTON PLANT

Stragety

The overall strategy is to identify and repair or replace all asbestos insulation in the South Charleston plant in accordance with the Asbestos Insulation Standard attached. The following are key parts of this strategy.

1. Continue work on the plant asbestos insulation survey. This survey is documenting the location and condition of asbestos insulation, including whether it can be stripped, repaired, or must be reinsulated. A cost estimate (±40%) is being developed for each segment of work. The survey should be completed by 4/30/86.
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ASBESTOS INSULATION STRATEGY AND ORGANIZATION (continued)

Strategy (continued)

4. Develop a scope document based on the survey results in (1) above for the remaining asbestos insulation work. This would include a cost estimate and funding/staffing strategy, with input from the Engineering Department, Managers Group, etc. as required; i.e. spread over three years, utilize 838-type projects, hard money bids, etc.

Organization

- The _____ insulators are organized as a central group; however, there are three insulators assigned to each field area for support of day-to-day maintenance activities.
- Administratively, the insulator group reports to a first line supervisor, _____, who reports to J. K. Corrie, Area 1 Superintendent..
- Another first line supervisor, _____, works closely with _____ and provides technical assistance in addition to planning and scheduling the insulation work for the group. This person also acts as contractor liaison and serves as relief for _____.

JRDement:mb
3/24/86
Attachment

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D R A F T

ATTACHMENT

ASBESTOS INSULATION STANDARD

All asbestos insulation in the South Charleston plant will be removed or permanently encased with metal jacketing and labelled "asbestos." Records will be maintained of all asbestos insulation. All repairs or removals of asbestos will be performed in accordance with this standard and applicable plant, divisional, corporate, or governmental procedures and regulations.

Standards

- o Where insulation is deteriorated (major tear or barrier off), the asbestos is stripped and replaced.
- o Any asbestos removed as part of a maintenance activity will be stripped and replaced.
- o Asbestos on permanently inactive equipment and lines will be stripped.
- o Asbestos insulation in good condition will be covered with metal jacketing.
- o Asbestos insulation that currently has metal jacketing will be inspected for any needed repairs to the jacketing.
- o Centralized records will be maintained for all asbestos insulation.
- o All asbestos insulation will be labelled.

Does photograph album satisfy this?

3/24/86

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D R A F T

ASBESTOS INSULATION STRATEGY AND ORGANIZATION

SOUTH CHARLESTON PLANT

Stragety

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ASBESTOS INSULATION STRATEGY AND ORGANIZATION (continued)

Strategy (continued)

4. Develop a scope document based on the survey results in (1) above for the remaining asbestos insulation work. This would include a cost estimate and funding/staffing strategy, with input from the Engineering Department, Managers Group, etc. as required; i.e. spread over three years, utilize 838-type projects, hard money bids, etc.

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JRDement:mb
3/27/86

Attachment

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