WV-0204 #68

Mary Pat & JKC, DSH, CEP

RECEIVED

APR 22 1986

MAINTENANCE DEPT.

UNION CARBIDE

ENVIRONMENTAL PROTECTION - SOUTH CHARLESTON PLANT

PLAINTIFF'S EXHIBIT

UC-2121

April 21, 1986

TO : See List Attached

CC : R. L. Foster/E. D. Southard
C. H. Hancock
Shift Department Heads
Shift Superintendents
EPD Staff Circulate

SUBJECT: Asbestos; EPA Regulations

REFERENCE 1: J. R. Soice to W. S. Walker, January 9, 1985
2: F. A. Sanchez to R. E. Peele et al., May 30, 1984

In view of the flurry of asbestos-related activity in the Plant, it seems like a good idea to re-issue the two letters cited in reference, which outline some of the EPA regulations ("NESHAPs") on asbestos. Note that

-- These regulations partially overlap OSHA regs--i.e., wet down before removal.

-- But they also go beyond OSHA regs in some ways--e.g., notification.

-- The lead time (at least thirty days) is necessary for large jobs so that EPD can file a notification with EPA and WVAPCC.

Also in addition to the NESHAP regulations, asbestos falls under CERCLA emission/spill reporting--the 1 lb RQ issue.

Jack

J. L. Worstell

JLW:cp
0447W
Attachments

UCC 006509

UNION CARBIDE

INTERNAL
CORRESPONDENCE

UNION CARBIDE CORPORATION P O BOX 8004, SOUTH CHARLESTON, WV 25303
SILICONES AND URETHANE INTERMEDIATES
SOUTH CHARLESTON PLANT

To/Location: W. S. Walker

Date: January 9, 1985

Originating Dept: Environmental Regulations

Copies to: E. P. Contacts
P. D. Gossage
Sal Rossi
F. A. Sanchez
J. L. Worstell
W. R. Yerkey

Subject: EPA Asbestos Regulations

Ref: Letter, F. A. Sanchez to R. E. Peele, et.al., "Asbestos Standards Applicable at 514 Plant", May 30, 1984.

Bill

On May 30, 1984, F. A. Sanchez sent you a letter summarizing the EPA standards for asbestos. The purpose of this letter is to highlight some of the more important aspects of those standards.

All demolition and/or renovation activities which involve asbestos must be reported in advance to the EPA. Plant 514 will submit three types of notifications. (1) A letter will be sent to the EPA each year covering routine miscellaneous maintenance operations (renovations). A letter has already been sent for 1985. (2) Any large scale maintenance jobs (renovations) must be reported separately. For instance, the stripping of several hundred feet of line for repairs would fall under this classification. (3) Any demolition activities must be reported by a separate letter.

In order for EPD to submit notification letters on time, we must be kept informed of any anticipated large scale renovations and any demolition work. To meet the EPA deadlines, EPD must be notified thirty days before any job is scheduled to begin.

Removal of asbestos must follow EPA criteria which generally prohibit any emissions of asbestos during the removal operation. This will usually involve thorough wetting prior to removal and sealing asbestos in leak-tight, labelled containers. Removed asbestos is not to be dropped or thrown to the ground as this will cause the release of asbestos fibers into the air.

Union Carbide trial exhibit UC-2121: J. L. Worstell Re-issuing Two Letters on EPA Asbestos (NESHAP) Regulations... Published by AsbestosClaims.Law
ACL Doc 17139 · Page 2 of 8 asbestosclaims.law/library/17139/2

Once the asbestos is bagged for disposal, it should be promptly transported to Goff Mountain for disposal. A properly prepared mainifest is required. One of the deficiencies noted during the Corporate Audit during August was our lack of prompt disposal of removed asbestos. Trucking must be kept aware of jobs involving asbestos removal so that prompt disposal can be made. No job should be considered complete until disposal has been accomplished.

Departments which have ongoing maintenance jobs involving asbestos should monitor the worksite daily to assure the prompt disposal of removed asbestos. "Orphan" bags of asbestos must be called to the attention of Trucking promptly to avoid a repeat of the situation discovered in August. Each Department must be responsible for avoiding any accumulation of removed asbestos within its area.

Very truly yours,

J. R. Soice

JRS/lms
0103S

Union Carbide trial exhibit UC-2121: J. L. Worstell Re-issuing Two Letters on EPA Asbestos (NESHAP) Regulations… Published by AsbestosClaims.Law
ACL Doc 17139 · Page 3 of 8 **asbestosclaims.law/library/17139/3**

UNION CARBIDE

INTERNAL
CORRESPONDENCE

UNION CARBIDE CORPORATION SOUTH CHARLESTON PLANT
Chemicals and Plastics Intermediates P.O. BOX 8004, SOUTH CHARLESTON, WV 25303

To (Name) R. E. Peele
Division W. S. Walker
Location
Area

Date May 30, 1984

Department ENVIRONMENTAL PROTECTION

Area

Subject Asbestos Standards Applicable at 514 Plant

Copy to G. W. Bott
P. D. Gossage
B. P. Johnson, Jr.
J. R. Soice
J. L. Worstell
EPD Staff (Circulate)

The attached summarizes the NESHAP Standards for asbestos which apply to operations at Location 514. This summary is being sent to you as primary contacts in order that you might pass the information on to the specific individuals that will ensure compliance with these standards. Normally, only maintenance and construction activities will be involved in the handling of asbestos.

I would like to request a copy of any written procedures or if you should know of someone who has written procedures for the handling of asbestos, please forward this information to me by June 30, 1984.

If you have any further questions or comments, please feel free to call me at X-2799.

Truly yours,

F. A. Sanchez

FASs/rls
0033A

Attachment

UCC 006512

NESHAP STANDARDS FOR ASBESTOS APPLICABLE AT 514

Title 40 of the Code of Federal Regulations, Part 61, Subpart M specifies the standards for handling and disposing of asbestos. Asbestos is considered a hazardous air pollutant due to its adverse health effects. Exposure to asbestos can cause fibrosis in the lungs leading to more serious illness like lung cancer.

I. DEFINITION: Asbestos means the asbestiform varieties of serpentinite, riebeckite, cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. As used here, the word asbestos includes asbestos, asbestos containing material, asbestos containing waste, and friable asbestos (i.e. can be pulverized)

II. STANDARDS APPLICABLE AT 514

A. Roadways: No owner or operator of a roadway may deposit asbestos on that roadway.

B. Demolition and Renovation:

1. Notification: The following information must be reported to the EPA Administrator:

a) Name and address of the owner or operator
b) Description of facility being demolished or renovated including size, age, and prior use.
c) Estimate of the amount of asbestos removed.
d) Location of the facility
e) Schedule of demolition activity
f) Nature and methods to be used
g) Procedures to be used to comply with these regulations
h) Name and location of the waste disposal facility used for the asbestos.

The report should be made in one of the following manners:

a) At least 10 days before demolition when the amount of asbestos is at least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other equipment.
b) At least 20 days before demolition when the amount of asbestos is less than 80 linear meter (260 linear feet) on pipes or at least 15 square meter (160 square feet) on other equipment.
c) As early as possible before demolition when such demolition is ordered by a state or local agency due to danger of immediate collapse or unsoundness.

At 514 Notifications will be made by EPD.

Union Carbide trial exhibit UC-2121: J. L. Worstell Re-issuing Two Letters on EPA Asbestos (NESHAP) Regulations... Published by AsbestosClaims.Law
ACL Doc 17139 · Page 5 of 8 asbestosclaims.law/library/17139/5

2. Emissions Control:

a) Asbestos must be removed before demolition begins unless:
   i) It is encased in concrete or similar material
   ii) It is adequately wetted whenever exposed

b) When a component with asbestos is taken out in sections:
   i) Adequately wet any asbestos exposed during disjoining operations
   ii) Carefully lower the sections to the ground, not dropping or throwing them.

c) Adequately wet all asbestos before being stripped from the facility components unless:
   i) A request has been made to EPA not to wet the asbestos due to unavoidable equipment damage; and
   ii) EPA has approved the use of a ventilation and collection system that will prevent any emission.

d) After a component with asbestos has been taken out:
   i) Adequately wet asbestos before stripping; or
   ii) Use a ventilation, collection system that will prevent any particulated asbestos emissions.

e) For asbestos that has been removed or stripped:
   i) Adequately wet and keep wet until disposed.
   ii) Carefully lower to the ground not dropping or throwing it.
   iii) Transport via dust-tight chutes or containers when removed or stripped over 50 feet above ground.

f) When the temperature is below 0 degrees C. (32 degrees F.):
   i) Remove components covered with asbestos as sections as much as possible.
   ii) Adequately wet asbestos before stripping and keep wet after removed until disposed.

g) If the facility is being demolished because of an agency order:
   i) Wet the portions covered with asbestos during the demolition.

Union Carbide trial exhibit UC-2121: J. L. Worstell Re-issuing Two Letters on EPA Asbestos (NESHAP) Regulations... Published by AsbestosClaims.Law
ACL Doc 17139 · Page 6 of 8 asbestosclaims.law/library/17139/6

C. Insulating Materials:

No owner or operator may install or reinstall any insulating materials that contain commerical asbestos if the materials are either molded or wet-applied.

D. Disposal:

1. No visible emissions are allowed while collecting, packaging, transporting, and disposing asbestos:

a) Treat asbestos with water:
i) Mix asbestos from emissions control devices with water to form a slurry and adequately wet all other asbestos wastes.
ii) No emissions must be discharged from collection, mixing and wetting operations
iii) After wetting, seal all asbestos in leak-tight containers while wet.
iv) Label all containers as follows:
"CAUTION CONTAINS ASBESTOS
Avoid Opening or Breaking Container
Breathing Asbestos Is Hazardous
To Your Health",
or use the warning signs specified by OSHA.

b) Process all asbestos waste so it can't be pulverized.
i) Form into pellets or other shapes
ii) Discharge no emissions while doing so

c) After all the asbestos waste has been packaged;
i) Complete a waste manifest and get EPD approval
ii) Dispose of the waste at Goff Mountain Landfill

F. A. Sanchez
5/22/84

FAS/rls
0033A

Union Carbide trial exhibit UC-2121: J. L. Worstell Re-issuing Two Letters on EPA Asbestos (NESHAP) Regulations... Published by AsbestosClaims.Law
ACL Doc 17139 · Page 7 of 8 **asbestosclaims.law/library/17139/7**

D I S T R I B U T I O N

R. P. Campbell	300-2
J. R. Dean	309-2
J. R. Dement	309-2
P. R. Desai	50
J. W. Hansgate	156
R. G. Hull	309-2
S. J. Chanley	152-2
D. H. Ott	261
J. C. Ketcham	50
L. C. Stewart	133-2
D. R. Stokely	323
T. G. Swanson	151-2
K. A. Windhorst	106-4

UCC 006516