PLAINTIFF'S EXHIBIT

UC-2130

BUSINESS CONFIDENTIAL

UNION CARBIDE CORPORATION

ENGINEERING, MANUFACTURING AND TECHNOLOGY SERVICES DEPARTMENT
HEALTH, SAFETY AND ENVIRONMENTAL TECHNOLOGY
SOUTH CHARLESTON, WEST VIRGINIA

MEMORANDUM

October 30, 1986

TO: Mr. J. R. Dement
Mr. J. F. Dodd
Mr. D. A. Gosselin
Mr. R. L. Foster
Mr. E. D. Southard

COPY: Mr. W. D. Bradbury
Dr. P. R. Kavasmaneck
Dr. D. Liebeskind
Mr. R. R. Rankin
Mr. S. Rossi
Mr. A. D. Williamson

FROM: H. W. Wegert
G. M. Whipple

SUBJECT: Health, Safety, and Environmental Review
Insulation Upgrade Project, South Charleston

This Health, Safety, and Environmental review was based on the draft Outline of Project and the South Charleston Plant Maintenance Procedure XVIII Provisions for Asbestos Material Removal and Disposal Safety. Attached are the applicable Summary Checklists; the Project Safety Summary Checklist was not included as no product is produced as a result of this project.

The review was conducted by qualified engineers from CEO's Health, Safety and Environmental Technology Section. Endorsement of the project is recommended contingent upon the items listed at the end of this memo. Written response to the contingency items by project personnel is requested prior to start of work in the field.

This project will upgrade asbestos insulation in the South Charleston Plant over the next three years. Much of the asbestos insulation in the plant is in poor condition and presents a potential exposure problem for plant personnel. The plan is to remove asbestos insulation from idle equipment, replace damaged asbestos insulation with an approved type, and seal all remaining asbestos insulation.

This project will be executed in accordance with all applicable OSHA and EPA Regulations and the South Charleston Plant procedure for handling asbestos material. The EPA will be notified that the removal of asbestos insulation could occur at the South Charleston Plant.

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The plant procedures for asbestos material removal and disposal safety was reviewed by CED Health Technologist Terry Hanning. The procedure should be revised in accordance with Terry's comments (see attached memo) for conformance with OSHA 29 CFR 1910.1001.

Additional comments on this procedure from an environmental viewpoint are:

- The procedure does not refer to review of State Air Pollution Regulation No. 15 which deals with notification of the West Virginia Air Pollution Commission.
- The procedure does not refer to state requirement to notify the West Virginia Department of National Resources before land filling.
- The procedure does not refer to NESHAPS 40 CFR 61.152 (Disposal Container labels) or 40 CFR 61.156 (Warning Signs at Landfill). However, the procedure does refer to OSHA warning label requirements and these are probably equivalent to the NESHAPS requirements. The procedure should clarify this issue, particularly the signs required at the landfill.

Based on review of the draft Outline of Project and Maintenance Procedure XVIII, endorsement of the project is recommended contingent upon the following:

1. Maintenance Procedure XVIII Provisions for Asbestos Material Removal and Disposal Safety be revised to be in compliance with the latest OSHA Standard 29 CFR 1910.1001 per Terry Hanning's memo.
2. Procedure XVIII be revised in accordance with the environmental concerns listed above.

Harvey W. Wegert
H. W. Wegert

Gary M. Whipple
G. M. Whipple

HWW:GMW:mw
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HS&E REVIEW SUMMARY

Reviewers

EP - L. K. (Linda) Scholl, Senior Chemist in CED's Land Disposal Technology Group

HS - H. W. (Harvey) Wegert, Group Leader of CED's Safety & Fire Protection Technology Group

Project Data

a. Material Balance - Not applicable

b. Environmental Releases - Asbestos removal wastes will be landfilled.

c. Governmental Requirements - HS&E regulations that apply to this project include OSHA 29 CFR 1910.1001, W. Va. State Air Pollution Regulation No. 15, and NESHAPS 40 CFR 61.152 & 156.

d. Corporate HS&E Policy Requirements - No variances are required.

e. Project Reviews

- o Process Safety/Health Review - Not applicable
- o Safety/Health Review Board - Not applicable
- o Pre-startup Safety/Health Review - Not applicable

Concerns

There are no HS&E concerns that had not been adequately discussed in the checklists or the endorsement review memo.

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