PLAINTIFF'S EXHIBIT

UC-2134

WV-0207 #22 C WES 5/12/87

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UNION CARBIDE

INTERNAL CORRESPONDENCE

SPECIALTY CHEMICALS DIVISION

Bldg. 82-902
South Charleston, WV 25303

TO: Attached Distribution List

DATE: May 4, 1987

FROM: C. R. Rotthoff

ORIG. DEPT: HS&EA
Personnel Safety

for your info + followup

SUBJECT: April 22, 1987 Meeting
Asbestos Standard Review

During the Asbestos Standard (1926.58) Review meeting recently held at Danbury, I took notes on matters of general interest. The notes are brief and refer to the asbestos standard:

- The manufacturing services group and C&P HS&EA will follow up on action items and report to appropriate functions;
  - Non-feasibility guidance.
  - Prepare a laundry list of small scale jobs.
  - Are plant buildings covered by EPA regulations (Legal Department).
  - Do or don't we have to label (Legal Department).
  - Emergency activitie guidance.
- Maintenance - repair activity is covered by the OSHA construction standard 1926.58.
- Negative pressure enclosures are required when feasible.
- No supplier will assure us of products (gaskets, packing, etc.) containing asbestos beyond 1987.
- New engineering standards noting asbestos product replacement will issue in September 1987.
- Can OSHA require controls when employee exposure is below the PEL? Yes, OSHA does have the statutory authority.
- Medical examinations and consultations should be available to each employee at time of assignment.
- Locations, which will undertake large scale asbestos removal projects, need to have or acquire a portable hygiene facility.

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- Contractors can be requested to supply medical and monitoring records.
- One location plans to identify asbestos in its pipe racks and track asbestos removal on a plant drawing.
- Labeling - need to identify new installations containing asbestos. Also need a system to alert employees who might come in contact with asbestos.
- Disposal costs are going up and available sites are harder to find. NJ shipping to western Pennsylvania.
- Asbestos work - be in full compliance.
- Each location is encouraged to discuss their first two or three non-feasible jobs with C&P HS&EA.
- Non-feasibility should be throughly documented and require a high level final approval.

Should anyone desire to discuss any of the preceding notes please call me at 8-721-2397 or (304) 747-2397.

Regards,

C. R. Rotthoff

CRR/rrp
3222K (5/6/87)

Union Carbide trial exhibit UC-2134: C. R. Rotthoff to Attached Distribution List on April 22, 1987 Asbestos Standar... Published by AsbestosClaims.Law
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