1) ~~JEH~~ WV-0191 #116

UNION CARBIDE

INTERNAL CORRESPONDENCE

2) ~~HWW~~

PLAINTIFF'S EXHIBIT

UC-2287

SPECIALTY CHEMICALS DIVISION

LOCATION 514
South Charleston, WV 25303

3) ~~JF Dodd~~

Terry Hanning's comments noted in red ink throughout

Chuck Grigsby (environmental) Comments noted in red pencil on Appendix I

Harvey Wegert 9-2-87

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

COPY: J. R. Dement
J. F. Dodd

FROM: J. K. Corrie

DATE: July 7, 1987

SUBJECT: Environmental Concerns from the Health, Safety and Environmental Review of the Insulation Upgrade Project - South Charleston

Attached is the revised South Charleston Plant Maintenance Safety Procedure XVIII - Asbestos Handling. As indicated in Dennis Hanshew's letter of May 6, 1987, also attached, I trust that you will find that the revised procedure addresses the concerns you outlined in your review report dated October 30, 1986.

As your endorsement of the South Charleston Plant Asbestos Insulation Upgrade Project was contingent upon those concerns being satisfied, I am requesting that you notify J. R. Dement and J. F. Dodd of your final endorsement or of any additional concerns you may have.

Procedure developed

To: ~~1) JR Dement~~

2) JK Corrie

Jk: How we proceed (re. Procedure) from here on out? Harvey Wegert on what we'll be changing. Let's get resolved quickly. Thx.

don't know why comments weren't sent directly to JKC. Jdf 9/9

RECEIVED
JUL 9 1987
H. W. WEGERT

UCC 002235

SUBJECT: ASBESTOS HANDLING

A. PURPOSE

To provide protection to plant and community personnel from the hazards of asbestos and to assure compliance with all plant, state and federal regulations.

Asbestos releases to the environment, including air, ground and water, are covered by Superfund regulations. A release of one pound or more of asbestos to the environment (air, ground, or water) must be reported by the plant Environmental Protection Department to the National Response Center, Washington, D.C., the West Virginia Department of Natural Resources, if to the ground or water, and to the West Virginia Air Pollution Control Commission if to the air. Any incident requiring a report to a government agency also requires notification of Division and Corporate officers.

This is a mandatory procedure and applies to all maintenance personnel and any person who removes asbestos.

B. DEFINITIONS

1. Asbestos - A fire resistant fibrous mineral used in fireproofing, insulation, brake linings, floor tile, ceiling tile, roofing, and siding which in dust form may be inhaled to produce a debilitating lung disease called "asbestosis".

2. Exposure Limits - Maximum quantities of airborne asbestos fibers to which a worker may be exposed, by law.

   Present OSHA permissible exposure limit (PEL) (June, 1986): During an eight-hour period, the time-weighted average shall not exceed 0.2 fibers, longer than five micrometers, per cubic centimeter of air.

3. Action Level - An airborne concentration of asbestos, tremolite, anthophyllite, actinolite, or a combination of these materials of 0.1 fiber per cubic centimeter (f/cc of air calculated as an eight hour time weighted average).

4. Regulated Area - An area established by the employer to define where airborne concentrations of asbestos exceed or can reasonably be expected to exceed the permissible exposure limit.

5. High-efficiency particulate air (HEPA) filter - A filter capable of trapping and retaining at least 99.97 percent of all monodispersed particles of 0.3 micrometers in diameter or larger.

Union Carbide trial exhibit UC-2287: J. K. Corrie to H. W. Wegert and G. M. Whipple on Environmental Concerns in... Published by AsbestosClaims.Law
ACL Doc 17279 · Page 2 of 4 asbestosclaims.law/library/17279/2

B. DEFINITIONS (continued)

6. Renovation - The modifying of any existing structure or portion thereof where exposure to airborne asbestos, tremolite, antophyllite, actinolite may result.

7. Demolition - The wrecking or taking out of any load supporting structural member and any related razing, removing, or stripping of asbestos, tremolite, antophyllite, or actinolite products.

C. RESPONSIBILITIES

1. Craftsperson - It is the responsibility of any person working with asbestos to know the health hazards involved and take all necessary precautions to protect themselves, others, and the environment. Each craftsperson shall:

   a. Attend/understand the asbestos training (TRAINS 514-3022 and 514-)
   b. Wear protective equipment as required
   c. Follow this procedure
   d. Challenge improper methods and actions by others
   e. Review the MSDS for asbestos

2. First Line Supervisor - It is the responsibility of the job supervisor to:

   a. Provide training for all subordinates in the health hazards and proper safeguards of asbestos removal and disposal as outlined in this procedure.

   b. Assure compliance with this procedure for all jobs under his/her supervision.

   c. Notify the Safety/Health Department, extension 2434, of each job to provide monitoring opportunity. Initial IH monitoring must be performed on jobs where negative pressure respirators are used.

   d. Notify the plant Environmental Protection Department as required (see D.1.c.).

   e. File a completed checklist upon job completion and distribute as indicated on the checklist.

Union Carbide trial exhibit UC-2287: J. K. Corrie to H. W. Wegert and G. M. Whipple on Environmental Concerns in... Published by AsbestosClaims.Law
ACL Doc 17279 · Page 3 of 4 asbestosclaims.law/library/17279/3

C. RESPONSIBILITIES (continued)

3. Area Superintendent - It is the responsibility of the Area Superintendent of the geographic area in which the job occurs to audit all asbestos stripping jobs performed by Maintenance Department insulators and consisting of 160 or more square feet or 260 or more linear feet of insulation. The Area Superintendent(s) with responsibility for insulators shall audit asbestos stripping jobs as required to assure compliance with this procedure.

4. Competent Person - It is the responsibility of the competent person to identify or to cause identification of existing asbestos and to take prompt corrective actions to eliminate or reduce the hazards of asbestos. The duties of the competent person include the establishment of negative - pressure enclosures, ensuring their integrity, and controlling entry to and exit from the enclosures, supervising any employee exposure monitoring required by the standard, ensuring that all employees working within such an enclosure wear the appropriate personal protective equipment, are trained in the use of appropriate methods of exposure contro', and use the hygiene and decontamination procedures specified in the standard; and ensuring that engineering controls in use are in proper operating condition and are functioning properly.

D. PROCEDURE

1. Job Sequence

Good, very positive statement!

a. Examine job for asbestos content. Consider sampling and analysis for content if time permits. If there is uncertainty regarding the presence of asbestos, the material shall be treated as if it is asbestos.

b. Notify the designated competent person.

c. Notify the plant Environmental Protection Department, ext. 3144, to ensure enough lead time for governmental notification. See the attached Environmental Asbestos Removal Notification Requirements in Appendix I & II for specifics.

d. Notify the owner of the equipment and/or piping to be stripped. Contact the Safety/Health Department to schedule monitoring.

e. Obtain necessary permits/permission (HWP and/or MC/LO).

NOTE: A Class B Hazardous Work Permit is required per S/H Procedure 2.3.

Union Carbide trial exhibit UC-2287: J. K. Corrie to H. W. Wegert and G. M. Whipple on Environmental Concerns in... Published by AsbestosClaims.Law
ACL Doc 17279 · Page 4 of 4 asbestosclaims.law/library/17279/4