BUSINESS CONFIDENTIAL

UNION CARBIDE CORPORATION

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

M E M O R A N D U M

September 2, 1987

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FROM: L. S. Magelssen
H. W. Wegert

SUBJECT: Health, Safety, and Environmental Review
Status of Contingency Items
Asbestos Insulation Removal Upgrade-Phase I
South Charleston

This project was recommended for endorsement by CED's Health, Safety and Environmental Section May 19, 1987, subject to two contingency items. These contingency items have been resolved as follows:

1. Maintenance Procedures XVIII Provisions for Asbestos Material Removal and Disposal Safety be revised to be in compliance with the latest OSHA Standards 29 CFR Parts 1910.1001 and 1926.58.

   The Maintenance Procedures dated February 1987 have been reviewed by Terry Hanning. In general, the procedures are good. Some minor comments by Terry are noted in red in the attached copy of the procedures (J. F. Dodd only). (Note that the February 1987 version of these procedures was not made available to the project HS&E reviewers in May 1987.)

2. Procedure XVIII be revised in accordance with the environmental concerns listed below:

   - 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.

PLAINTIFF'S EXHIBIT
UC-2288

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- 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.

All three environmental contingencies are related to the written procedures for handling asbestos. The revised procedures, Asbestos Handling No. XVIII, dated 2/87 are very well written and adequately address the environmental concerns. One way the procedures could be strengthened is to add a short section on requirements to be an acceptable site for asbestos disposal. This suggestion should not be considered a contingency item.

L. S. Magelssen

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