PLAINTIFF'S EXHIBIT

UC-2315

UNION CARBIDE

INTERNAL CORRESPONDENCE

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

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

Date May 30, 1984

Originating Dept. ENVIRONMENTAL PROTECTION

Area

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

Subject Asbestos Standards Applicable at 514 Plant

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 003105

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.

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ACL Doc 17305 · Page 2 of 4 asbestosclaims.law/library/17305/2

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.

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ACL Doc 17305 · Page 3 of 4 **asbestosclaims.law/library/17305/3**

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
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ACL Doc 17305 · Page 4 of 4 asbestosclaims.law/library/17305/4