PLAINTIFF'S EXHIBIT

UC-2342

UNION CARBIDE CORPORATION
Silicones & Urethane Intermediates
PERSONNEL SAFETY AND HEALTH
SOUTH CHARLESTON, WEST VIRGINIA

MEMORANDUM

December 15, 1983

To: T. G. Swanson

cc: W. E. Ballard
C. E. Fry
R. W. Holland, Jr., M.D.
D. G. Moshier
Maintenance Area Superintendents
Maintenance Department Heads
W. E. Williams

Subject: Amended Asbestos Standard

DEC 16 1983

From: W. C. Young

Salient points of OSHA's emergency temporary standard on asbestos exposure most likely to impact on plant operations are listed below. The amended standard became effective November 4, 1983. At the end of a six-month period OSHA intends to adopt the new provisions permanently.

Please call me if there are any questions or if I can assist in compliance which, incidentally, may be achieved by any feasible combination of engineering controls, work practices, and personal protective equipment according to OSHA.

CHANGE	PLANT STATUS
1. Reduction of 8-Hr permissible exposure limit from 2 to 0.5 fibers per cc of air.	Plant exposure monitoring data appear substantially low and agree with the estimated range by OSHA (see attachment).
2. Information/training for all employees exposed $>$ 0.5 f/cc.	Although not required on the basis of exposure monitoring, this is an on-going 327 Dept. activity. (A recommendation for consideration is that future training include elements of the amended standard. Outline attached.)
3. The ETS limits use of our disposable respirators to airborne concentrations "not to exceed 5 f/cc or 10 x PEL." (This is a reduction from 20 f/cc, TWA_8.)	The magnitude of most asbestos-related jobs and relatively short duration of exposure potential are primary reasons that measured concentrations are within limits. (To ensure compliance in all cases will, in my judgement, require strict adherence to established procedures, especially use of effective wet methods for removal/demolition work. The latter practice is not consistently followed.)

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Table 1 (Cont.)

OSHA Estimate of Employee Exposure to Asbestos

Industry Segment	Number[a] of Exposed Workers	Number[a] of Plants	Current Exposure level f/cc
Repair and Maintenance			
Drywall removal, renovation, and demolition[e]	12955	1296	20.0
	38866	3887	0.2
Repair and maintenance involving asbestos removal	14845	1465	0.15
Maintenance workers in schools, chemical plants electrical generating plants and foundries	N/A	N/A	0.15
TOTAL WORKERS EXPOSED ABOVE 0.5 f/cc[f]			48,644
TOTAL EXPOSED WORKERS			375,399

[a] Population and facility estimates were based on the RTI report (Ex. 84-009) and updated to 1983 employment levels by JRB Associates.

[b] The number of plants in the SIC codes making up Secondary Fabricators (2451, 3357, 3523, 3531, and 3842) was derived by JRB Associates by taking the number of establishments with 20 or more employees, as listed in the Economic Information Systems data base for 1983, and expanding that number by the percent of establishments with fewer than 20 employees, as listed in County Business Patterns, 1980. Not knowing exactly how the 17,204 Secondary Fabrication (SF) workers and 4,304 SF plants were distributed among the 4 types of SF facilities, OSHA assumed that the workers and plants were distributed equally among the 4 types of SF facilities.

[c] Assumed that 20% of 3045 shipbuilding/repair workers are not in compliance with current respirator requirements. Hence, the number of workers was adjusted to reflect the 20% of exposed workers.

[d] Assumed average firm employs 9-10 workers as is true of SIC 17 (construction, special trade contractors).

[e] Assumed that 25% of 51820 drywall removal, renovation, and demolition workers are not in compliance with current respirator requirements. Hence, the number of workers was adjusted to reflect the 25% of exposed workers.

[f] This figure excludes segments that are in compliance with 0.5 PEL such as floor tile, brake repair, roofing felts, and repair and maintenance.

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Union Carbide trial exhibit UC-2342: W. C. Young to T. G. Swanson on the Amended OSHA Asbestos Standard (19...
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