GWW
It would be nice to attach the asbestos removal procedure to this document - assume we have one?

GW

UNION CARBIDE CORPORATION
Specialty Chemicals — Sistersville, WV

PLAINTIFF'S EXHIBIT
UC-3056

February 5, 1986

MEMORANDUM TO: All Department Heads
Maintenance 2nd Line
Maintenance 1st Line
Operations Department Coordinators

COPIES TO: D. G. Beddow
K. F. Carroll
L. W. Phair
W. V. Summers

SUBJECT: Asbestos Insulation Philosophy - Sistersville Plant

Attached are the Sistersville Plant's Philosophies and Guidelines concerning asbestos insulation. Please make yourself familiar with these and execute accordingly.

G. W. Wulfert
G. W. Wulfert
Maintenance Manager

GWW:ts

Attachment

UCC 001992

SISTERSVILLE PLANT
PHILOSOPHIES AND GUIDELINES FOR ASBESTOS INSULATION

Following is the Sistersville Plant's philosophy concerning asbestos insulation:

Our plan is to identify all asbestos insulation, to seal where pratical, and to remove and replace with non-asbestos material where repair jobs require removal for completion of the job.

Maintenance Guidelines for Maintaining/Removing Asbestos Insulation:

(1) If the installed asbestos insulation has damage that can be patched, and sealed, do it rather than complete removal.

(2) If the installed asbestos insulation can be effectively sealed, do it versus replacement.

(3) If a repair job on pipe, equipment, or a tank requires the removal of asbestos insulation in order to get at the work, then replace the asbestos insulation with approved, non-asbestos type insulation. Proper procedures must be followed during the removal, and proper disposal methods used for the asbestos insulation.

(4) Maintenance Coordinators should fill out their Work Order requests with all the above in mind.

The Sistersville Plant is 30 years old, and being that old the piping and other equipment were originally insulated with asbestos. Much of the asbestos has been removed and safely disposed of in the landfill as repairs and replacements have occured. No insulation containing asbestos has been purchased since 1973, but some asbestos still remains.

Concern has been expressed that plant personnel are continually exposed to airborne asbestos fibers from unsealed insulation and dust from the entire plant surface. Monitoring conducted in a number of Plant locations, including some having unsealed asbestos nearby, has shown below the detectable limit of the analytical method. Sampling downwind of asbestos removal operations shows the same non-detectable levels. We believe this is because the Insulator Mechanics carefully follow the procedures that have been developed to prevent contamination of the environment and themselves while removing asbestos.

Maintenance Craftsmen (and Operators for that matter) may work along side of asbestos insulation. If they, or their

Union Carbide trial exhibit UC-3056: G. W. Wulfert to Department Heads and Maintenance on Asbestos Insulation... Published by AsbestosClaims.Law
ACL Doc 17900 · Page 2 of 3 asbestosclaims.law/library/17900/2

Supervisors, feel that protective equipment is needed they can safely use throw-away coveralls and Comfo II Respirators. These are usually short duration jobs and certainly do not involve the potential of exposure as would an insulator whose job it is to remove and handle asbestos insulation.

In many cases the risks created by the removal would far exceed any which would arise if the insulation were left in place effectively sealed.

In conclusion, "The Plant does not intend to enter into a program for the wholesale removal of installed insulation for no other reason than that it contains asbestos."

George Wulfert

Ken Williams

ASBESTOS.GWW
2-6-86 slm

Union Carbide trial exhibit UC-3056: G. W. Wulfert to Department Heads and Maintenance on Asbestos Insulation... Published by AsbestosClaims.Law
ACL Doc 17900 · Page 3 of 3 asbestosclaims.law/library/17900/3