PLAINTIFF'S EXHIBIT

UC-3131

ASBESTOS INSULATION REMOVAL PROJECT

OBJECTIVE OF THE PROJECT

The objective of this project is to minimize hazards of airborne asbestos in the South Charleston Plant.

JUSTIFICATION

The justification ~~of~~ for this project is Occupational Health. The present OSHA Asbestos Standards, 1910.1001, specifies two fibers/cc as the maximum allowable exposure over an 8-hour period.

ALTERNATIVES TO REMOVAL

Continue operations with the present asbestos insulation. Personnel may be exposed to airborne particulate asbestos.

TECHNICAL RISK

There is no technical risk associated with this project.

OCCUPATIONAL HEALTH CONSIDERATIONS

This project will correct an occupational health concern by removing asbestos insulation from equipment, lines and facilities. When the insulation is being removed, safety and health guidelines will be followed which includes: installing rope barricades and clearing the area of plant personnel; posting of warning signs; proper bagging and disposal of insulation; and monitoring of surrounding work areas. In addition, assuring that contractor personnel adhere to guidelines such as: wet clean-up; wearing of appropriate respirators; wearing and disposal of proper clothing.

ENVIRONMENTAL PROTECTION CONSIDERATIONS

This project will be in compliance with all applicable OSHA and EPA Regulations. The U. S. Environmental Protection Agency will be notified that the removal of asbestos insulation could occur at the South Charleston Plant.

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PROJECT PLAN

Initial implementation of this project authorized the removal of asbestos insulation from idle equipment and lines only, as specified in approved "838 Work Order Requests". These areas included:

- Specialty Chemicals
- Middle Island
- Polyols
- Upper Island
- Specialty Catalyst
- Solvent Vinyl Resins

Subsequent "838 and 930 WOR's" have also been approved for removal and replacement of asbestos and temporary insulation at the Oxide Adducts Unit.

The work associated with this project will be performed by outside contractors. Powerhouse Equipment Company is currently on-site performing this activity. Work priorities and schedules will be developed based on the criteria contained in the attached "Asbestos Project Criteria". A preliminary "Schedule for Asbestos Removal" is also attached which reflects individual job status. Through 1987, approximately $72,000 has been spent on this project. Projected costs to be incurred as a result of this project scope are anticipated to run about $5 million over the next 3 years.

In order to effectively manage this project, a single individual has been assigned as the "Insulation Contract Coordinator" (Herb Price x2953). The attached job description reflects the initial attempt to define the activities associated with this position. During the next few weeks, Herb will meet with each department head (or designated unit contact) to review individual department requirements in order to develop a composite list of the plant's critical few.

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Schedule For Asbestos Removal

WK Ending 4/17/87.

Location Complete	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
216	201281 ✓	Patch & Seal Trunk 273 Asbestos		3-27-87		28
Complete 157	193735 ✓	strip 48' ¾" Pipe Covering. Asbestos		4-10-87		
Complete 152	203321 ✓	strip 36' ½" pipe Covering Asbestos		4-10-87		
Complete 117	195337 ✓	strip 40' 2" Pipe Covering Asbestos		4-9-87		
Complete 133	190642 ✓	strip 22' 1½" Pipe Covering Asbestos.		4-13-87		
Complete Rack Bld 122	200193 ✓	Remove Approx 30' double layer insulation (Exp. Loop) in Rack & Reinsulate		4-13-87		34

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Schedule For Asbestos Removal

WK Ending 4/17/87:

Location	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Bldg 216	193197	Reinsulate Tank 643 & 644, Blast & Paint per Est. # 24334, scaffold & Material.			760	
101	193795	Strip Asbestos in #101 6 pcs 12" Flgs., 16 pcs 8" Flgs 12' 1" pipe covering. 1-8" Pump.			96	
102	188681	Strip 175 L.Ft. 1" piping				
216	201306	Remove Asbestos in Bldg 103 & 216 Area. 24' Lin. ft. 6"x12" Duct, 231' 5" Coundit				
216	201307	Strip Insulation and re-insulate Tank 661/662 per Est. # 23000				
Complete 303	200151	Repair & Remove Ins. in Bldg 303. Drumming Area.		3-30-87 Worked	WK Ends.	131 M.Hrs

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Schedule For Asbestos Removal

WK End 4/17/87

ocation	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Bldg 191	190894	Strip & Seal Asbestos Hanging from Lines so. 191 Press Area 180 M.H. to strip & seal Insulation in Rack.			180 M.H.	
Bldg 75	199793 ✓	Remove Asbestos inside of Bldg 75 & Replace & Line west of Bldg. 1172 Lin ft.	4-17-87		976 To Strip 1172'	
Bldg 36	201091 ✓	Strip Back 1' each way to dry Insulation & Reinsulate Eth. Oxide Line Lower Island			40H	
N. Chas	190895	Mis. Insulation at Bulk Term. Disb. N. Chas. Approx. 500 M.H. to strip, Patch Insulation, & Insulate Lines & Eq.	4-13-87	5-15-87	500	
Bldg 323	198912	Remove Asbestos & Replace N.W. Corner No. 7 Dock Approx 40'	4-7-87	4-17-87	1.H	
Bldg 216	193196 ✓	Remove Asbestos from Trunk C113 & 6HH & Ass. piping. Remove Foam from C03 & 6011. 90' piping & 2100 sq ft Asbestos.	4-20-87	6-15-87		

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Schedule For Asbestos Removal

WK Ending 4/17/87

Location	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expend.
Bldg 36	838-2401	Reinsulate #4 & #5 Reactor & piping inside enclosure 1900 sq. Ft. Reactors 1670 Lin. Ft. Piping	On Hold	On Hold	1406	
Bldg 36	930-2030	Strip. #4 & #5 Reactors & piping inside enclosure 1900 sq Ft. Reactors 1670 Lin. Ft. Piping	3-23-87 On Hold	On Hold	2206	328.5
Bldg 109	192731	Remove asbestos on 1st Flr & Replace Approx. 200' Lin Ft.	3-17-87 Stripped			142 M.
Bldg 156	195339	Strip Asbestos on Tanks #420, 5051, 5052, 5115, #0141 Remove ins. on piping inside & East of Bldg. 1486 sq ft. 1901 Lin. Ft. Piping	4-1-87	6-15-87	2252	811
Bldg 42	192730	Reinsulate Eth. Oxide Lines #42.	3- -87			88
Bldg 42	201583	Asbestos Removal Bldg 42 & Tank Farms. 620	4-1-87			21

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Schedule For Asbestos Removal

4-17-87

Location	Job No.	Job Description	Starting Date	Finish Date	Man Hours Estimated	Man Hours Expended
Bldg 151 Complete	192464	strip Asbestos 40' Lin. Ft. 4" Pipe Covering		4-10-87		
151	199457	strip Asbestos, 12' ½" P.C. 3' 1" P.C. 4' 16" Piping			24	
west 36	201116	strip Asbestos from Evaporator in field. 135 sq ft.			32	
Complete 146	200469			4-10-87		80
196	192682					106

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