PLAINTIFF'S EXHIBIT

UC-3160

SPECIALTY CHEMICALS DIVISION

SOUTH CHARLESTON PLANT ENGINEERING

September 1, 1987

TO: D. J. McNeil
C. R. Rotthoff
M. J. Shoger
D. R. Stokely
J. L. Worstell

CC: R. P. Campbell
S. J. Chanley
J. F. Dodd
S. W. Drake
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K. P. Holz
B. D. Mollohan
W. N. Stratton
W. J. Vincent
R. W. Williams

FROM: T. G. Huff

SUBJECT: Project Scope Document
B-303 Transitional Operation/Demolition Phase II
S.O. #198456, EON 87412

This scope document is issued for the approval of the Engineering Manager, the Chemical Mixing Department Head, the Specialty Chemical Division Personnel Safety Manager, the Plant Safety Department Head and the Environmental Protection Department Head.

OBJECTIVE OF THE PROJECT

This project has two objectives. First, it will provide temporary facilities needed for two-way transfer of drums between the new Drumming Center and live and dead bottom truck trailers. (This temporary operation will begin with the startup of the new Drumming Center and will end with the start of Bldg. 303 Demolition Phase III B.) Second, it will allow completion of post-demolition activities needed in the Slurry Bay which can not proceed until the west wall of the new Drumming Center is built.



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CAPITAL WORK

None.

REVISIONS AND REARRANGEMENT WORK

Mechanical

A temporary conveyor, approximately 160 ft long, will be purchased and installed (by contractor) on the south patio of B-303. The conveyor will originate in the new Drumming Center and will terminate at a tie-in on the west end of the existing, low level conveyor on the south patio.

Relocated restroom fixtures will be plumbed to the city H20 supply (hot and cold) and to the process sewer.

Electrical

All of the electrical drives and control switches on the temporary conveyor will be pre-wired to a central terminal box by the conveyor contractor. UCC CED Construction will run a power circuit from a breaker on the new Drumming Center startup generator to the central terminal box.

Civil

The existing restroom facility was disassembled to remove asbestos transite architectural panels during Phase I. The facility will be reassembled using new sheet metal architectural panels and will be redesigned to accommodate the new block wall at Column 15. The existing fixtures will be reused.

RETIREMENT WORK

The asbestos containing transite siding on the east wall of the Slurry Bay (Column 16) will be removed and disposed of.

The handling and disposal of asbestos containing materials will be done in accordance with all Federal, State and Local Laws and Regulations as well as all UCC Standards (see "Safety and Health Considerations" for a detailed description of removal methods).

Following siding removal, the supporting structural steel framing on Column 16 will be removed.

ENVIRONMENTAL PROTECTION CONSIDERATIONS

All asbestos removal and disposal work will be done in accordance with WV APCC and NESHAPS Regulations.



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A qualified asbestos abatement contractor will remove and dispose of all asbestos containing materials. Prior to starting demolition, Plant 514 Environmental Protection Department will review and approve the contractor's proposed disposal site to establish regulator compliance and liability aspects. Contractor will provide Plant 514 EPD with all the information needed for EPD to file the NESHAPS notification with Federal and State Agencies.

SAFETY AND HEALTH CONSIDERATIONS

The handling and disposal of asbestos containing materials will be done in accordance with all Federal, State and Local Laws and Regulations as well as all UCC Standards.

Asbestos containing transite does not fall under Federal EPA or WV State NESHAPS Regulations because it is considered a non-friable material (will not easily crumble and pulverize so as to release air-borne asbestos fibers under hand pressure). Consequently, methods for removing and disposing of transite vary widely throughout industry. Removal will be accomplished without using a negative pressure enclosure (the size of Building 303 - roof span is 90 feet - renders it impractical).

Discussions were held with three different contractors who have current experience removing transite. All three are using the following method successfully - their personnel and area sampling are consistently showing exposure levels below the OSHA action level (0.1 fibers/cc $TWA_8$).

- The only personnel present within the confines of the demolition zone during transite removal activity will be the demolition contractor.
- All openings connecting the demolition zone with immediately adjacent, occupied areas will be temporarily sealed off with polyethylene covers.
- Prior to removal, warning signs shall be erected and, if appropriate, barriers shall be erected to control the spread of asbestos-containing dusts.
- Contractor shall provide a clean room, equipment room and wash room immediately adjacent to the demolition zone.
- Personnel shall don protective clothing and respiratory protection as required by OSHA and the South Charleston Plant Respiratory Protection Manual prior to entering the demolition zone.
- Contractor shall visually inspect surfaces of the transite material noting damaged and friable surfaces areas. Prior to removal, a bridging encapsulant shall be applied to the damaged and friable surfaces of the transite panels. Particular attention shall be paid to joints and seams of the materials.



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- 6 mil Polyethylene sheeting shall be placed on all surfaces below the material to be removed.

- The transite shall be carefully and thoroughly saturated with a gentle spray mist of amended water or penetrating encapsulant/sealant as appropriate. Contractor shall carefully detach transite material from the substrate. Extreme care shall be exercised to prevent damaging transite materials. Transite materials, while still wetted shall be placed and sealed in 6 mil polyethylene disposal bags with appropriate asbestos waste warnings. All bags of asbestos materials shall then be placed in an identical bag in order to form a total thickness of 12 mils. Transite materials which cannot be placed in disposal bags shall be carefully wrapped with 6 mil polyethylene sheeting to a total thickness of at least 12 mils. All joints in the sheeting shall be secured with tape and appropriate asbestos warning labels securely affixed. All surfaces from which asbestos transite panels have been removed shall be wet-wiped or hepa-vaccumed as appropriate. All cleaning and other disposable items including protective clothing shall be treated as asbestos containing waste.

- Transite panels which have been penetrated by pipe, conduits or structural rods require special consideration. Whenever practical, the penetrating pipe, conduit or rod will be withdrawn before removing the transite panel. When this is not practical, the transite panel will be scored and struck with a hammer to break away the necessary pieces.

- Transite materials shall be transported according to EPA, OSHA, DOT regulations.

- Disposal of asbestos-containing transite shall be at a landfill licensed to accept asbestos-containing waste according to all Federal, State, and Local authorities.

- Contractor shall fully document actual disposal of each waste load with proper waste manifests and landfill receipts.

- Contractor will ensure personnel and area air sampling is performed according to the most stringent applicable specifications and will ensure final clearance air sampling is performed and final air sampling results are within acceptable limits before releasing any project area for occupancy by unprotected personnel. If, at any time, the results of air monitoring inside or outside the work area indicates a fiber concentration above 0.1 fibers/cc $TWA_8$, the contractor shall modify work practices and add the controls necessary to prevent exceeding this limit.



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- Transite removal will be done between 11:00 p.m. and 7:00 a.m., when no Distribution or Maintenance personnel are on-site. Floor sheeting shall be disposed of after each work shift. All surface dust shall be wiped and/or vacuumed.

- A UCC construction inspector/qualified safety monitor will be on-site continuously during the demolition activity. This individual will be trained and outfitted identically to the contractor's employees.

The above transite handling and disposal method has the understanding and agreement of the following:

| | |
|---|---|
| Mr. R. P. Campbell | Production Representative |
| Mr. K. P. Holz | Production Representative |
| Mr. T. G. Huff | Project Manager |
| Mr. C. R. Rotthoff | SC Div Personnel Safety Manager |
| Mr. R. D. Ondocsin | Corporate Industrial Hygienist |
| Mr. W. J. Vincent | 514 Plant Industrial Hygienist |

PROJECT PLAN

Engineering will be done by South Charleston Plant Engineering. CED Construction Group and a qualified conveyor contractor will perform all Revisions and Rearrangement work. Asbestos transite siding removal will be done by a qualified asbestos abatement contractor.

Please sign on the following page if this project, as described, meets with your approval.

Tim Huff

TGH/wdm
Ext. 2584
Attachments
3632G



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B-303 Transitional Operation/Demolition Phase II
S.O. #198456, EON 87412

APPROVAL SIGNATURES: DATE

D. J. McNeil (Engineering Manager) 9/10/87

D. R. Stokely (Production Department Head) 9/14/87

M. J. Shoger (Plant Safety Department) 9-24-87

C. R. Rotthoff (Personnel Safety Manager) 9/28/87

J. L. Worstell (Environmental Protection Dept.) 9/28/87

TGH/wdm
9/1/87
3632G



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KANAWHA
RIVER
BACK
CHANNEL
SLURRY BAY
EXIST. WALL TO BE RELOCATED
NEW DRUMMING CENTER AREA
DEMOLISH TO GRADE
RELOCATED RAIL CAR STOP
DRUMMING CONVEYORS-SCALES
REMOVE OVERHEAD TANKS
TRANSLOADING
DISTRIBUTION OFFICES (UPPER LEVEL)
EMPTY DRUM STAGING (LOWER LEVEL)
LOADING PLATFORM
SCALE HOUSE
ROUTE 60
TRANSITIONAL ARRANGEMENT
PHASE I COMPLETE
PLANT PLOT PLAN
CONTAMINATED & CLEAN
SEWER ROUTING
UCC 000236

KANAWHA
RIVER
BACK
CHANNEL
SLURRY BAY
NEW CHEMICAL MIXING DRUM-MING CENTER.
TEMPORARY START-UP POWER SUP-PLY.
DRUMMING CONVEYORS-SCALES
TEMPORARY START-UP CONVEYOR
TRANSLOADING
EMPTY DRUM STAGING (LOWER LEVEL)
DISTRIBUTION OFFICES (UPPER LEVEL)
LOADING PLATFORM
SCALE HOUSE
ROUTE 60
TRANSITIONAL ARRANGEMENT
PHASE II COMPLETE
PLANT PLOT PLAN
CONTAMINATED & CLE
SEWER ROUTING
UCC 000237