PLAINTIFF'S EXHIBIT

UC-3166

UNION CARBIDE

INTERNAL CORRESPONDENCE

SPECIALTY CHEMICALS DIVISION

Bldg. 82-902
South Charleston, WV 25303

TO:	W. J. Vincent - 514	DATE:	January 9, 1987
FROM:	C. R. Rotthoff	ORIG. DEPT:	HS&EA Personnel Safety & Occupational Health
CC:	S. W. Drake* - 514 D. A. Gosselin - 514/82 M. J. Shoger* - 514	SUBJECT:	South Charleston - Provisions For Asbestos Material Removal and Disposal

* Letter copy only

Wesley;

I have noted some specific comments in the margin. Much of what is documented in your asbestos removal document assumes that no technology exists to prevent concentrations of asbestos from exceeding the PEL. By staying below the PEL, where possible, regulated areas and other standard provisions should be avoided.

I believe that it would be advisable to somehow identify those actions/steps which are mandatory because we think and/or know the PEL will be exceeded. Surely, this identification will make changes more readily accepted by everyone should technology be forthcoming which prevents asbestos concentrations from exceeding the PEL.

Please call me, ext. 2397, if I can be of further assistance.

Sincerely,

C. R. Rotthoff

C. R. Rotthoff

CRR/dw
2776K (1/08/87)

Enclosure

UCC 000262

PROVISIONS FOR ASBESTOS MATERIAL REMOVAL AND DISPOSAL

A. Purpose

To provide protection to plant and community personnel from the hazards of asbestos and to assure compliance with all plant, state and federal regulations.

Asbestos releases to the environment, including air, ground and water, are covered by Superfund regulations. A release of one pound or more of asbestos to the environment (air, ground, or water) must be reported by the plant Environmental Protection Department to the National Response Center, Washington, D.C., the West Virginia Department of Natural Resources if to the ground or water, and to the West Virginia Air Pollution Control Commission if to the air. Any incident requiring a report to a government agency also requires notification of Division and Corporate officers.

This is a mandatory procedure and applies to all maintenance personnel and any personnel who removes asbestos.

B. Definitions

1. Asbestos - A fire resistant fibrous mineral used in fireproofing, insulation, brake linings, floor tile, ceiling tile, roofing, and siding which in dust form may be inhaled to produce a debilitating lung disease called "asbestosis".

2. Exposure Limits - Maximum quantities of airborne asbestos fibers to which a worker may be exposed, by law.

   Present OSHA allowable limit (June, 1986): During an eight-hour period, the time-weighted average shall not exceed 0.2 fibers, longer than five micrometers, per cubic centimeter of air.

   Action Level - Means an airborne concentration of asbestos, tremolite, anthophyllite, actinolite, or a combination of these materials of 0.1 fiber per cubic centimeter (f/cc of air calculated as an eight hour time weighted average).

   Regulated Area - Means an area established by the employer to demarcate areas where airborne concentrations of asbestos exceed or can reasonably be expected to exceed the permissible exposure limit.

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