WV-0231 #39

Hyandra

1) GW
2) GWS

UNION CARBIDE

INTERNAL CORRESPONDENCE

GWW's copy

Send copies to:
Shas Walker
R.W. Williams
Keith Purinton
Dick Hazelwood

3/20/87

SPECIALTY CHEMICALS DIVISION

Bldg. 82-902
South Charleston, WV 25303

TO: Attached Distribution List

DATE: March 3, 1987

FROM: C. R. Rotthoff

ORIG. DEPT: HS&EA
Personnel Safety
& Occupational Health

CC: Attached Distributon List

SUBJECT: Asbestos Management

HS&EA's guidance on Asbestos Management for the Specialty Chemicals Division is:

✓ 1) Complete encapsulation of servicable asbestos insulation is a long term, viable and legitimate option (See Attachment A).

✓ 2) Damaged asbestos insulation should be replaced with non-asbestos containing materials.

✓ 3) Should complete removal of asbestos materials prove to be a viable economic approach, it should be undertaken in a planned program in strict accordance with existing regulations which have recently been revised and which, in-part, include these significant requirements.
   - o Use of negative pressure enclosures during asbestos removal (See Attachment B).
   - o Disposal of asbestos containing materials in a suitable waste landfill.
   - o Labeling of asbestos waste containers (boxes, drums, bags, etc.)
   - o Proper personnel protective equipment and the asbestos removal notification requirements must be fulfilled as before.

This correspondence provides the direction on two key asbestos issues - encapsulation and negative pressure enclosures. Attachments A, B & C are included with this correspondence because they provide the background information which is important to the understanding of the guidance provided for Asbestos Management. Your full understanding and acceptance of the guidance is necessary. Please contact me as needed (304) 747-2397 or 8* 721-2397.

Sincerely,

C. R. Rotthoff

CRR/rhw
2968K (3/04/87)

Attachments

UCC 020029

PLAINTIFF'S EXHIBIT
UC-3999

Union Carbide trial exhibit UC-3999: C. R. Rotthoff to Attached Distribution List on Asbestos Management in the Sp... Published by AsbestosClaims.Law
ACL Doc 18628 · Page 1 of 2 asbestosclaims.law/library/18628/1

Wang ATTACHMENT "A"

UNION CARBIDE CORPORATION P-2 39 OLD RIDGEBURY ROAD
CHEMICALS & PLASTICS GROUP DANBURY, CT 06817-0001
HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

TO: D. Liebeskind DATE: March 3, 1987

COPY: R. E. Bollinger SUBJECT: Encapsulation of Asbestos
D. R. Crowell
C. R. Rotthoff
B. L. White

Dave,

This is in response to your request for guidance on the likelihood that an Agency would sometime in the future mandate the removal of asbestos or asbestos-containing products from the workplace. You noted the importance of this issue in view of the resources that you plan to expend to encapsulate asbestos insulation in your facility. The response below reflects C&P HS&EA's view, with the concurrence of Don Crowell and Betty Lynn White.

Recently I had the opportunity to meet Mr. Charles Adkins, Director of Health Standards Programs for OSHA, and was able to discuss this issue with him. ~~While Mr. Adkins gave the expected caveat of "not being able to give total assurances as to what the Agency will or won't do years from now...,"~~ he firmly stated that he could not contemplate OSHA's ever requiring removal of in-place asbestos insulation. He noted that that activity would in fact create a greater hazard than merely leaving the insulation in-place. He further stated that OSHA's role in asbestos removal would be limited to setting standards when asbestos was to be removed based on other considerations.

You are, of course, aware that EPA also gets into the "asbestos business". The Asbestos Hazard Emergency Response Act of 1986 gives EPA authority to regulate containment and removal of asbestos in school buildings, and some interests are pushing for expansion to commercial buildings. EPA is also considering banning the use of asbestos in certain commercial products. While these possible actions do not apply to the (chemical) workplace, these are some circumstances in which EPA could, in the absence of an OSHA response to a hazardous situation in the workplace, take action. This, however, would appear to be highly unlikely here.

Accordingly, there would appear to be no reason not to proceed with your encapsulation program.

Sincerely,

R. E. Plevan

REP/pjm
0576Y
2957K, Wang received 3/3/87

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