WJ-0097 #75

PLAINTIFF'S EXHIBIT
UC-4297

UNION CARBIDE CORPORATION

ENGINEERING, MANUFACTURING AND TECHNOLOGY SERVICES DEPARTMENT
HEALTH, SAFETY AND ENVIRONMENTAL TECHNOLOGY
SOUTH CHARLESTON, WEST VIRGINIA

MEMORANDUM

September 2, 1986

RECEIVED
SEP 03 1986
G. P. MAXWELL

TO: Safety/Health Advisory Committee
See Attached Distribution

FROM: S. W. Clark

CC: P. R. Kavasmaneck, 2000-3235 (511)
D. C. Macauley, P-4610 (500)
C. C. Neely - 2000-3335 (511)
H. W. Wegert - 2000-3314 (511)

SUBJECT: SHAC Meeting
September 9-10, 1986

MAP
Do the draft any help to you in preparing a procedure you spoke of? any comments on it?
cM
9-3-86

Attached are:

- The draft C&P Asbestos Policy that the Clyde Neely committee has been developing.
- Draft "Venting to the Atmosphere Design Criteria," that Jim Simerl has been working on.
- Updated agenda based on additional input I have received.

See you on the 9th.

S. W. Clark

/jc
Attachment

UCC 011242

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UNION CARBIDE CORPORATION
ENGINEERING, MANUFACTURING, AND TECHNOLOGY SERVICES
Central Engineering
South Charleston, West Virginia

UCC BUSINESS CONFIDENTIAL

August 28, 1986

TO: Mr. J. E. Sanders

COPY TO: Mr. L. E. Calvert
Mr. S. W. Clark
Mr. G. B. Elder
Mr. R. W. Engle

FROM: C. C. Neely

SUBJECT: Draft of Recommended Policy
Use of Asbestos-Containing Materials in the Work Place
Chemicals and Plastics Business Group

Attached for your consideration is a draft of the subject recommended policy dated August 27, 1986. This document represents the effort of the Special Working Group which you appointed in early July as follows:

Larry Calvert - Manufacturing Office
Stan Clark - Safety/Health Technology
George Elder - Corrosion and Materials Engineering
Rex Engle - Piping Technology
Clyde Neely - Engineering Mechanics

As discussed, we believe that we have reached the point where guidance is needed for our continued efforts to be productive. Accordingly, we plan no further work in this regard until we hear from you.

It is our collective judgment that the implementation of this policy will have a relatively modest cost impact on the functions that will be involved in its implementation. For example, we estimate that a 1 to 1-1/2 man year effort will be required to accomplish the duties assigned to CED. However in our opinion "normal" TMS budgets should not be expected to carry this total expense.

By copy to the Special Working Group members I would like to take this opportunity to thank them for their professional efforts to date in preparing the attached.

We look forward to receiving your comments.

C. C. Neely

CCN:at
Attachment
2350I

UCC 011243

8/28/86

D R A F T

RECOMMENDED POLICY

CHEMICAL AND PLASTICS BUSINESS GROUP (C&P)

SUBJECT: USE OF ASBESTOS-CONTAINING MATERIALS[1] IN THE WORK PLACE

PURPOSE/BACKGROUND

The Corporate Charter (1.1) contains the following commitment to employees:

> "To provide working conditions, programs of training and education, and persistent review and appropriate modification of facilities and practices to protect the health and safety of employees."

It also contains a social commitment to conduct business "in accordance with all the applicable national and local laws and regulations."

As a result of available evidence that airborne asbestos in the occupational environment had proven to be carcinogenic in man, all C&P Insulation Standards were revised in 1976 to specify only asbestos-free insulating materials; and new or replacement installations of these materials have subsequently been selected accordingly. Additionally, a Safety/Health Standard designated SH-256 was prepared covering the safe removal and handling (includes disposal) of asbestos-containing insulating material during renovation and demolition. The requirements of this Standard equal or exceed those of current applicable government standards.

OSHA's rule-making efforts relative to asbestos usage in the work place are mired in controversy. Hearings on the latest EPA proposal which includes the phaseout of all asbestos over a ten-year period are now in progress. The proposal states: "EPA is considering banning the manufacture, importation, and processing of asbestos construction products and asbestos clothing soon after the rule's promulgation with the category of asbestos friction products banned about five years later, and other asbestos products banned at a later time." Gaskets and packing that contain asbestos are in the category of "other asbestos products" that would apparently be banned after ten years. No peer company that we are aware of has a target date for removal of existing asbestos-containing insulation, gaskets, or packing; however, one major chemical company has recently discontinued the purchase of asbestos-containing gaskets and packing.

A cost analysis of pipe-size gaskets shows that GRAFOIL®, probably the most expensive of the acceptable gasket substitute materials, is, in fact, cost effective when only the cost of mandatory work practices associated with the use of asbestos (e.g. wetting for removal or airborne fiber

[1] "Asbestos-containing materials" include but are not limited to insulation, gaskets, packing, welding blankets, and building materials.

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exposure monitoring during removal, placing in labeled plastic bags after removal, landfill disposal, and record keeping) is considered. The same conclusion is drawn relative to valve packing when the additional considerations of improved service life and sealability are included.

Consistent with the aforementioned commitments and the economic use of materials, C&P has concluded that positive actions relative to asbestos-containing materials(1) should be taken.

POLICY

Except as otherwise provided by applicable law, Chemicals and Plastics Business Group will:

Continue to phase out the use of asbestos-containing materials:

- Asbestos-containing insulation shall be replaced with asbestos-free materials as required to maintain structural and functional integrity.
- No asbestos-containing materials shall be purchased after January 1, 1989.
- C&P approved practices shall be employed for the identification, removal, modification, and/or disposal of asbestos-containing materials.
- Evaluation of asbestos substitute materials shall include consideration of health effects as well as suitability for intended service and cost.
- A variance approval procedure shall be employed to cover consideration of uncommon circumstances. Approval must always include endorsement of C&P HS&EA management.

SCOPE

This recommended policy applies to all C&P operated/hosted facilities. Other components of the Corporation will be apprised of its content.

DELEGATION

The assignment of duties and authority to carry out the policy defined herein is delegated as follows:

To Central Engineering Department

- Develop and maintain engineering standards covering:
  - Identification of asbestos-containing materials;

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- Removal, modification and/or disposal of asbestos-containing materials; and

- Use of asbestos-substitute materials.

To Site Management

- Implement policies and practices for the identification, removal, modification, and disposal of asbestos-containing materials.

- Use of CED Standards covering asbestos substitute materials and the communication of service experience with these materials.

To Manufacturing Services

- Monitor use of asbestos-substitute materials and the communication of service experience with these materials.

To C&P HS&EA

- Audit compliance with governmental regulations and CED-developed standards relating to asbestos-containing materials and, where applicable, their substitutes.

C. C. Neely
2073W

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