WV-0097 #118

PLAINTIFF'S EXHIBIT

UC-4301

UNION CARBIDE CORPORATION TECHNICALCENTER
P.O.BOX 8361 S. CHARLESTON, WV 25303

INTERNAL CORRESPONDENCE

To: R/D Grade 12 and above
Services Department Heads
Construction Managers

Copy to: T. L. Collins
C. P. Maxwell
B. R. McMakin
L. R. Noble
R. J. Romagnoli
R. W. Scoular
P. D. Sherman

Date: September 15, 1986

Orig.Dept. HS&EA

Area: Industrial Hygiene

Subject: Asbestos

Asbestos containing materials such as insulation, gaskets, packing, heat tapes and hot gloves are commonly found in the industry. The use of materials that contain asbestos is now being discontinued and in several other situations the users are finding better substitute materials which do not contain asbestos. EPA is proposing to phase out the use of asbestos in several products in the next ten years.

Recently, OSHA has amended its asbestos standard by reducing the permissible exposure limit from 2 fibers per c.c. of air to 0.2 fiber per c.c. of air along with many other requirements where employees exposure exceed the permissible exposure limit.

At the Technical Center we no longer install asbestos containing pipe insulation material. In most other situations the users of materials, such as hot service gloves and heat tapes, are well aware of the hazards of asbestos and tend not to use or buy them. However, such materials might have been purchased in the past or may be laying around in the laboratories and pilot plants where employees may use them. After repeated use of these materials they tend to get weak and begin to break down. Under such conditions they may create a potential exposure problem.

Since, safer substitutes are available for hot service gloves and heat tapes it is strongly recommended that asbestos containing such materials be discontinued for any use and should be disposed off. You should also check those equipment or pipes in your area of responsibility for broken asbestos insulation. The broken insulation should be repaired (encapsulated) promptly or replaced with a non-asbestos containig insulation to prevent a potential exposure risk.

Industrial Hygiene (ext. 3750) should be consulted to ensure compliance with the OSHA standard before conducting any repair or replacement of an old insulation. If you have questions about identifying the presence of asbestos in any material that you use, let us know we may be able to help you identify it.

If you need any assistance in this matter please give me a call at extension 3750.

Manhar A. Patel

Manhar A. Patel
Technical Center Industrial Hygienist

UCC 011285

UNION CARBIDE CORPORATION
P. O. BOX 8361, SOUTH CHARLESTON, W VA 25303

December 12, 1985

Mr. Dennis Hanshew, Engineer
Compliance Division
WV Air Pollution Control Commission
1558 Washington Street, East
Charleston, WV 25311

Subject: Annual Notification of intent to renovate equipment and/or piping in 1986, involving friable asbestos. (40CFR 61.22.d)

Dear Mr. Hanshew:

The Union Carbide Corporation Technical Center may have numerous 1986 renovation activities which involve less that 180 square feet or 260 linear feet of friable asbestos insulation. Attached are the projected amounts of materials involved as per 40 CFR 61.22d.

No work is planned for 1986 which would involve demolition or the renovation of equipment or piping where 160 square feet or 260 linear feet of friable asbestos insulation or greater amount is involved. If work of this scope is required, appropriate notification as per 40 CFR 61.146 will be given in a separate notice before the start of work. If an emergency arises, notification will be sent during the work period.

Please contact me at 747-3713 should you have any questions concerning this information.

Sincerely,

R. H. Smith

Attachment

0805P
RHS:rab

cc: Ben Mykijewycz - EPA
Tim Laraway - DNR

UCC 011286

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