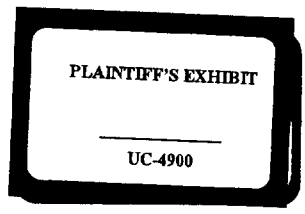
UNION CARBIDE

PRODUCT SAFETY PROGRAM

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UNION CARBIDE CORPORATE POLICY

PRODUCT SAFETY

ISSUED 9/30/81

1. FURNISH CUSTOMERS AND USERS WITH RELIABLE PRODUCTS THAT IF USED, UTILIZING UNION CARBIDE'S PRODUCT SAFETY COMMUNICATIONS DO NOT INVOLVE UNREASONABLE RISK.

2. FURNISH CUSTOMERS WITH APPROPRIATE PRODUCT SAFETY COMMUNICATIONS.

3. REGULARLY REVIEW PRODUCT SAFETY INFORMATION AND, IF NECESSARY, EXPAND THE PRODUCT SAFETY INFORMATION AND, IF APPROPRIATE, MODIFY THE PRODUCT, MODIFY THE PRODUCT DESIGN, AND/OR MODIFY THE PRODUCT SAFETY COMMUNICATIONS.

4. COMPLY WITH ALL APPLICABLE GOVERNMENTAL LAWS, REGULATIONS.

5. DOCUMENT IMPLEMENTATION OF ITEMS ONE THROUGH FOUR.

6. ESTABLISH AND MAKE KNOWN TO GOVERNMENTS, THE PUBLIC AND UNION CARBIDE PERSONNEL RESPONSIBLE POSITIONS ON PRODUCT SAFETY ISSUES.

7. SPEAK WITH ONE CONSISTENT VOICE.

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DUTIES AND ROLES OF
UNITED STATES COMPONENTS

1. END RESULT ACCOUNTABILITY FOR PRODUCT SAFETY.

2. LINE DUTY TO COMMUNICATE PRODUCT SAFETY INFORMATION TO OTHER U.S. COMPONENTS AND AREA COMPANIES.

3. DUTY TO DEVELOP INTERNAL CONTROL SYSTEM TO ACHIEVE OBJECTIVES OF CORPORATE PRODUCT SAFETY POLICY.

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DUTIES AND ROLES OF HS&EA
RELATED TO U.S. COMPONENTS

1. LINE ROLE TO INFORM COMPONENTS OF THEIR DUTIES UNDER CORPORATE PRODUCT SAFETY POLICY.

2. COORDINATING ROLE TO ISSUE POLICIES
   - A. TO IMPLEMENT CORPORATE PRODUCT SAFETY POLICY
   - B. FOR RESPONSES OF COMPONENTS TO PRODUCT LIABILITY CLAIMS INCLUDING THE AUTHORITY TO APPROVE RESPONSES BEFORE THE FACT
   - C. FOR INTERNAL CONTROL SYSTEMS OF COMPONENTS INCLUDING THE AUTHORITY TO APPROVE THE ADEQUACY OF THE COMPONENT INTERNAL CONTROL SYSTEM.

3. DUTY AND AUTHORITY TO CONDUCT AUDITS FOR:
   - A. ADEQUACY OF INTERNAL CONTROL SYSTEM
   - B. COMPLIANCE WITH CORPORATE PRODUCT SAFETY POLICIES I AND II
   - C. COMPLIANCE WITH APPLICABLE LAWS.

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DUTIES AND ROLES OF AREA COMPANIES

1. END RESULT ACCOUNTABILITY FOR PRODUCT SAFETY.
2. LINE DUTY TO COMMUNICATE PRODUCT SAFETY INFORMATION TO U.S. COMPONENTS AND OTHER AREA COMPANIES.
3. DUTY TO DEVELOP MANAGEMENT SYSTEM INCLUDING POLICIES AND AUDITS AND ACHIEVING OBJECTIVES OF CORPORATE PRODUCT SAFETY POLICY PATTERNED AFTER UCC SYSTEM.

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DUTIES AND ROLES OF HS&EA RELATED TO AREA COMPANIES

1. COORDINATING ROLE WITH DUTY TO ISSUE POLICIES WHICH DEFINE THE REQUIREMENTS FOR AREA COMPANY MANAGEMENT SYSTEMS INCLUDING AUTHORITY TO APPROVE SYSTEMS FOR ADEQUACY.

2. DUTY AND AUTHORITY TO CONDUCT AUDITS.

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CORPORATE PRODUCT SAFETY

1981 - 82

CATEGORY I PRODUCT SAFETY POLICY ESTABLISHED BY UCC MANAGEMENT COMMITTEE.	7/81
FIRST DRAFT CORPORATE PRODUCT SAFETY MANUAL ISSUED.	4/81
CORPORATE PRODUCT SAFETY MANUAL ISSUED - 11 POLICIES AND 4 DRAFT POLICIES.	8/81
CORPORATION ISSUED CATEGORY I PRODUCT SAFETY POLICY.	9/81
INFORMAL INITIAL DIVISION REVIEWS STARTED.	9/81
INFORMAL INITIAL REVIEWS SCHEDULED FOR COMPLETION.	8/82

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WHY PUSH
PRODUCT SAFETY??

NEED	RESPONSE BY LEVEL I PRODUCT SAFETY POLICY
1. CORPORATION NEED TO COMPLY WITH LEGISLATED LAWS AND REGULATIONS.	ITEMS 4, 5, 6 & 7
2. CORPORATION DESIRE TO MINIMIZE DAMAGES OF INCREASING PRODUCT SAFETY LITIGATION.	ITEMS 1, 2, 3 & 5

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PRODUCT SAFETY DEPARTMENT ORGANIZATION

CATEGORY I POLICY	LEGAL REQUIREMENT	HS&EA MANAGER	DIVISION INPUT GROUP
PRODUCT SAFETY COMMUNICATION	"DUTY TO WARN"	L. A. CRISORIO, ESQ.	CORPORATE PRODUCT SAFETY COMMUNICATION COMMITTEE
REGULARLY REVIEW PRODUCT SAFETY INFORMATION	"DUTY TO TEST"	DR. R. M. MILTON	AD HOC CORPORATE COMMITTEES
COMPLY WITH LAWS AND REGULATIONS	COMPLY	DR. D. L. HEYWOOD	CORPORATE PRODUCT SAFETY REGULATORY COMMITTEE
ESTABLISH POSITIONS AND SPEAK WITH ONE VOICE	NONE	DR. D. L. HEYWOOD	CORPORATE PRODUCT SAFETY REGULATORY COMMITTEE

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PRODUCT SAFETY MANAGEMENT POLICY

COMPONENT HEAD RESPONSIBLE FOR DEVELOPING AND MAINTAINING MANAGEMENT SYSTEM TO DO THE FOLLOWING:

1. ASSIGN END-RESULT ACCOUNTABILITY.
2. PROVIDE ORGANIZATIONAL MEANS OF COORDINATING.
3. DESIGNATE AN INDIVIDUAL TO REPRESENT COMPONENT TO CORPORATE PRODUCT SAFETY COMMITTEE.
4. DEVELOP COMPONENT POLICIES.
5. EDUCATE PERSONNEL TO DUTIES UNDER APPLICABLE LAWS AND CORPORATE PRODUCT SAFETY POLICIES.
6. PROVIDE FOR A REGULAR AUDIT.
7. CORRECT DEFICIENCIES.
8. DEVELOP PRODUCT SAFETY ANNUAL PLAN/BUDGET.
9. REPORT PROGRESS.
10. REPORT PRODUCT SAFETY EVENTS.
11. MANAGE PUBLIC RELATIONS FOR PRODUCT SAFETY EMERGENCIES.

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PRODUCT SAFETY
COMMUNICATIONS POLICIES

1. PRECAUTIONARY LABELING
2. MSDS
3. EXPERIMENTAL MSDS
4. SAFE PRACTICE AND SAFE USE LITERATURE
5. OBSERVATION OF QUESTIONABLE PRACTICE IN NON-UCC FACILITIES
6. CUSTOMER REQUEST FOR WORKPLACE AIR MONITORING
7. CHRONIC HEALTH HAZARDS LABELING - CARCINOGENS - DRAFT

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PRODUCT SAFETY

INFORMATION REVIEW AND ACQUISITION

1. MAINTAIN FILES ON REQUIRED PRODUCT SAFETY INFORMATION
   - A. ACUTE TOXICITY AND IRRITANCY
   - B. SIGNIFICANT END-USE APPLICATIONS
   - C. HEALTH HAZARDS FROM PRODUCT COMBUSTION, REACTION, ETC.
   - D. HEALTH HAZARDS FROM PRODUCT FAILURE
   - E. PRODUCT PARTITIONING BETWEEN AIR, WATER, SOIL, AND BIOTA
   - F. SUMMARY OF INCIDENCES OF DAMAGE TO HEALTH OR ENVIRONMENT

2. EVERY 4 YEARS, FOR SIGNIFICANT RISK PRODUCTS, EVALUATE AND DOCUMENT THE NEED FOR ADDITIONAL INFORMATION SUCH AS:
   - A. EPIDEMIOLOGY
   - B. REPEATED DOSE TOXICITY SHORT AND LONG TERM (TERATOGENIC, CARCINOGENIC, REPRODUCTIVE, ETC.)
   - C. PERSISTENCE, BIOACCUMULATION AND TOXICITY IN THE ENVIRONMENT

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PRODUCT SAFETY
REGULATORY POLICIES

1. TSCA 8B - INVENTORY
2. TSCA 8E - SUBSTANTIAL RISK
3. TSCA 5A - PMN

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