

**PLAINTIFF'S
EXHIBIT**

UC-447

**UNION
CARBIDE**

INTERNAL CORRESPONDENCE

~~CDK~~
~~LEG~~

UC 149-2

(3) JMF-155
MAR 15 1985

P. O. BOX 471, TEXAS CITY, TEXAS 77590

D.T. WATERS

Beats me... DK

SOLVENTS & COATINGS MATERIALS DIVISION
Energy Systems Department

DATE: March 7, 1985

TO: Mr. R. W. Klein

COPY: Mr. J. W. Beard - 511
Mr. B. V. Binford
Mr. T. O. Blum
Mr. G. G. Cochran
Mr. V. D. Dutcher - 803
Mr. D. C. Kirby - 511
Mr. F. C. Phinney

Mr. J. M. Poulson - 511
Mr. F. S. Provenzano
Mr. G. D. Twait
Mr. D. T. Waters - 511
Mr. H. W. Wegert - 511
Mr. R. C. Wise
Mr. R. L. Yelton - 500

SUBJECT: OS/HS No. 3 Powerhouse - Texas City Plant
Update No. 3 (1st Quarter 1985)

Attached is the update on the Response/Actions to the subject survey which was conducted February, 1984.

Status of the action planned is summarized as follows:

1. Complete	21
2. On-Hold	<u>3</u>
Subtotal	24
3. Incomplete	<u>3</u>
Total	<u>27</u>

The 3 incomplete and 3 items on-hold are circled in the text for easy reference.

Ken Klyng
Ken Klyng

KWK/lrt
Attachment

HL.1 Knockout Pots - Cont'd

Response

The drains will be re-routed to one unit blowdown pot minimizing any possible personnel exposure.

Completion Date: Complete

Responsibility: G. G. Cochran

HL.2 Removal of Asbestos-Containing Insulation

Asbestos-containing insulation is still present in the No. 3 Powerhouse facility. Some activities require that this insulation be stripped. When the maintenance department insulator strips asbestos-containing insulation, OSHA CFR 1910.1001 regulations are reported to be followed. However, employee exposure to ambient concentrations of asbestos fibers have reportedly occurred at times when:

- 1) Unit personnel disregard the barriers installed around the area where asbestos-containing insulation is being removed.
- 2) Maintenance personnel other than insulators unintentionally strip asbestos-containing insulation.
- 3) Insulator's outer clothing which is contaminated with asbestos fibers is not properly removed.
- 4) Winds carry the asbestos fibers outside the area that is barricaded for the removal operation.

Recommendation

Continue emphasizing to unit personnel the importance of obeying barriers and the importance of following established procedures when removing asbestos-containing insulation and when removing asbestos-contaminated clothing. When the insulation material is unknown, the insulation should be treated as though it contains asbestos.

Response

All personnel in the area will be removed from roped off areas during removal of asbestos insulation.

Completion Date: Complete

Responsibility: B. Vyvial