WV-0031 #2

UNION CARBIDE CORPORATION
Specialty Chemicals — Sistersville Plant

MEMORANDUM TO: S. L. Curtis

FROM: D. A. Boggs

DATE: November 7, 1986.

SUBJECT: Serious Asbestos Health Hazard; Monomers North Rectification Area

COPY TO:
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A visual inspection of the distillation column towers in the north end of Monomers Rectification Area revealed large quantities of exposed, deteriorating asbestos insulation at various points of the equipment. Inspection of the graveled area north of the columns resulted in finding multiple chunks of asbestos material (ranging from 1/2" to 2" in diameter) as far away as ~ 60 yards north. Three of these samples were picked up from the graveled area and sent to the Plant Spec Lab for identification. Subsequent microscopic analysis resulted in a positive identification of asbestos.

On Friday, October 31, 1986 the area immediately under the columns was hosed down and cleared of all fallen asbestos material. The area was barricaded and posted with proper warnings to personnel of the asbestos hazard. An inspection of the area by myself and the responsible Maintenance supervisor was made on Monday, November 3, 1986. Multiple pieces of asbestos material were observed in the concrete diked area under the columns. This material had fallen over the previous two days. This observation alone showed the magnitude of the problem in existence.

Due to the height of the columns (80-100 ft.) and the deteriorated condition of the asbestos insulation on the five columns a potential for wide-ranging airborne asbestos fibers exists. (New OSHA regulations have dropped the permissible exposure limit (PEL) on asbestos from 2 fibers/cc to 0.2 fibers/cc with an action level for monitoring and medical surveillance on exposed workers to 0.1 fibers/cc.) Although IH monitoring has not been performed specifically on personnel working in this area, the observation of large quantities of exposed deteriorated asbestos and the obvious "fall out" evidenced from 10-31-86 to 11-3-86 of this same material into the surrounding work areas provides sufficient justification for regulating the area with barricades, signs, and requiring personnel protective devices.

Due to the hazardous health potential existing it is imperative that attention be given to correcting this situation as soon as possible. Proper protection of employees must be followed in the immediately affected area. Actual determination of the total area affected will be difficult. Area IH monitoring will be performed for airborne fibers as soon as weather permits, in order to try and make this determination.

PLAINTIFF'S EXHIBIT
UC-4074

Recommendations:

1. Repair or remove the asbestos insulation from the area to eliminate the potential for airborne asbestos fibers in excess of 0.1 fibers/cc.

2. Barricade and post the area in which asbestos material is visible on the ground notifying all personnel of the potential asbestos hazard.

3. Comfo II with HEPA (high efficiency) filters (red cannisters) required to enter area.

4. Disposable coveralls required for entrance into barricaded area.

5. Perform I.H. monitoring inside and outside of barricade for identification of airborne fiber concentrations.

A further action item is being pursued by IH personnel to identify and gather area sample data throughout the plant where exposed asbestos exists currently.

Please call me on Unicom 8-731-1475, or ext. 475 if you have any questions.

D. A. Boggs
Industrial Hygienist

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