

W-0-11478

UNION CARBIDE CORPORATION
ENGINEERING AND TECHNOLOGY SERVICES DIVISION
CENTRAL ENGINEERING
SOUTH CHARLESTON, WEST VIRGINIA

MEMORANDUM

January 6, 1984

TO: J. W. Barna M. A. Patel
W. Bosserman D. R. Paugh
R. E. Cashdollar H. H. Price
R. E. Crum C. L. Warner
J. W. Karn K. E. Williams
C. A. McNeil

COPY TO: R. A. Derr
C. P. Maxwell
M. L. Mills

SUBJECT: ASBESTOS INSULATION REMOVAL PROJECT
STEAM PLANT AND MONOMERS UNIT - SISTERSVILLE PLANT

In our meeting on Thursday, January 5, 1984 we reviewed and discussed the preparations and precautions that we determined necessary for the Construction Department to safely remove asbestos insulation from piping and equipment in the Monomers Unit and Steam Plant in the Sistersville Plant. The purpose of this message is to document and communicate all of the measures that we agreed were appropriate and to identify the persons responsible for specific action steps.

This project is to begin on Tuesday, January 10, 1984 and will include removing asbestos insulation from piping and equipment in the two units identified earlier. The Construction Department will use approximately ten employees over a period of six months to complete this project.

A review of Procedures VIII-22, Asbestos Insulation - Removal and Disposal (Construction) and II-13, Handling, Installing, Removing and/or Disposing of Materials Containing Asbestos (Sistersville Plant) revealed that our procedures are very similar. The consensus of the group was that since our employees are more familiar with our procedure it would serve as the general guideline in performing this work. ←

We also agreed that in addition to all of the requirements in Construction Department Procedure VIII-22 the following action would be appropriate for this project.

PLAINTIFF'S EXHIBIT

UC-4070

UCC 022400

1. Environmental Protection Agency (EPA) Notification - Wayne Bosserman or a representative of the plant EP Department will provide the EPA with documentation that meets this agencies reporting criteria for asbestos removal and disposal.
2. Respiratory Protective Equipment - Construction employees assigned to this project will wear MSA, Comfo II dual cartridge type respirators, instead of the 3M-8710 disposable respirator normally worn by Construction employees when stripping asbestos. L. R. Noble will fit test and certify all employees to wear this respirator. The Sistersville Plant will supply all Comfo II (MSA, Type H filter cartridges will be used) respirators and replacement cartridges needed to perform this work.
3. Wetting the Insulation - Water will not be used to wet the insulation as it is removed. Nancoil, a wetting agent concentrate used by the plant will be used by Construction employees. The plant agreed to purchase and supply this wetting agent for this project. Construction will supply the equipment to apply the Nancoil.
4. Monitoring - Technical Center Industrial Hygiene will monitor Construction Department employees for exposure to asbestos. Results of this monitoring will be made available to the plant Industrial Hygiene Department, who will communicate the monitoring results to plant representatives as they determine necessary. Plant Industrial Hygiene will periodically monitor the work area via area sampling. M. Patel of SII/I.H. will contact W. Bosserman concerning project monitoring.
5. Orientation - L. R. Noble will conduct an orientation session with all employees assigned to this project to review and discuss the hazards of asbestos, recent plant problems and experiences with asbestos, work/safety procedures, and protective equipment.
6. Unit Hazards - W. Bosserman or a plant I.H. representative will conduct a review session for all Construction employees on the hazards of the units where the work will take place. The purpose of this training is to ensure that the employees are knowledgeable of the chemical hazards of the work area.
7. Communications - Construction supervision responsible for this project will prepare a Construction Hazardous Work Permit (HWP) for all asbestos removal work. He will issue a copy of this HWP to the Unit Operations Supervisor each day that we are to remove asbestos in a particular work area. The purpose of the HWP is to ensure that communications take place between plant production and maintenance employees and construction employees regarding when and where asbestos removal work is in progress from day to day.

8. Toilets and Other Plant Facilities - Construction employees will be instructed not to use any plant toilet or lunch room facilities during the course of this project. Construction supervision will provide facilities for our employees.

All preparations and precautions outlined in Construction Procedure VIII-22 Asbestos Insulation - Removal and Disposal will be followed in addition to the guidelines described in this memo.

If you have any questions concerning this project or the proposed action steps feel free to give me a call on extension 6455. (Location 512/2149)

L. R. Noble
Construction Safety Department

Sistersville procedure
SAFETY AND HEALTH PROCEDURES MANUAL

*Procedure and LRA used here
we could only
do this with
Sistersville
Plant permission*
SECTION: 11 - 15
PAGE: 1 of 4
DATE: 9-14-82
REVISED: 11-28-83

SUBJECT: Handling, installing, removing and/or disposing of material containing asbestos.

1.0 PURPOSE:

- 1.1 To provide a safe procedure for the handling of material containing asbestos. Asbestos is defined to include Chrysotile, Amosite, Crocidolite, Tremolite, Anthophyllite, and Actinolite.

2.0 INTRODUCTION:

- 2.1 Excessive exposure to asbestos fiber is harmful to your health. These fibers have been associated with cancer of the lungs, throat, stomach, colon, and rectum. The maximum permissible exposure is two (2) fibers, longer than five (5) micrometers, per cubic centimeter of air when averaged over 8 hours. At no point in time may an employee be exposed to greater than 10 fibers per cubic centimeter of air.
- 2.2 Asbestos fiber can be found in insulation used on piping, equipment, etc., that was installed earlier than about 1973 or 1974. This was when the Sistersville Plant deleted asbestos containing insulation from Stores and went to an "asbestos free" insulation.
- 2.3 Asbestos fibers can also be found in some brake linings used on automobiles, trucks and our work vehicles.
- 2.4 Asbestos fibers can also be found in the wall coverings, insulation, etc., used in the construction industry on older buildings.

3.0 RESPONSIBILITY:

- 3.1 It is the responsibility of the appropriate first line supervisor and craftspersons to control the safe removal and disposal of asbestos-containing material.
- 3.2 Based on size, complexity and location, the Safety and Health Department shall be notified prior to the start of the job. At that time a decision will be made as to the need for and extent of any monitoring. It is the responsibility of the Supervisor of the personnel handling the asbestos-containing material and the actual individual to request monitoring.
- 3.3 Proper Housekeeping is the responsibility of each individual in performance of the work assignment. Appropriate equipment for prevention of dust release and clean-up after the job has been provided. Please use this equipment but never use a broom, brush or blow with air when handling materials containing asbestos.

Responsible for review and update of this procedure - Mtcc. Dept.

- 3.4 It is the responsibility of the Environmental Protection Control Staff to notify the EPA of the annual amount of asbestos activity in the plant.
- 3.4.1 The EPA must also be notified prior to large scale jobs. These are defined as stripping of more than 260 linear feet of pipe insulation or more than 160 square feet. It is the responsibility of the Insulator Supervisor to notify the EPC Staff prior to such jobs.
- 3.5 The responsible supervisor shall ensure that employees using asbestos-containing material have received proper training on the hazards of asbestos.
- 3.6 If an employee must wear respiratory protection, it is the responsibility of the supervisor to assure that the employee is medically approved and has received proper training on the use of respiratory protection.
- 3.7 It is the responsibility of the individual craftsperson to wear respiratory equipment when required.
- 4.0 PROCEDURE:
- 4.1 All asbestos-containing material will be handled with extreme care and our goal is to take appropriate measures to eliminate all airborne asbestos fibers.
- 4.2 When asbestos is involved, barricade tape will be used to isolate the area and caution signs will be posted at all access routes to the work area. These signs will be located at a distance which allows an employee to take the necessary protective steps before entering the area. This sign will comply with OSHA specifications and shall read:

ASBESTOS DUST HAZARD
AVOID BREATHING DUST
WEAR ASSIGNED PROTECTIVE EQUIPMENT
DO NOT REMAIN IN AREA UNLESS YOUR WORK REQUIRES IT
BREATHING ASBESTOS DUST MAY BE HAZARDOUS TO YOUR HEALTH

- 4.3 Asbestos-containing material will be handled, mixed, applied, removed, cut, or otherwise worked on in a wet state sufficient to prevent the emission of airborne asbestos fibers in excess of exposure limits.

- 4.4 Asbestos-containing cement, mortar, coatings, plaster, wrappings, or other materials will not be removed from bags, boxes, or other containers, in which it was shipped, without first wetting, enclosing or ventilating.
- 4.5 Employees engaged in the handling or removal of asbestos-containing material will wear approved respiratory protection. The individuals will normally be insulators, insulator helpers, and vehicle mechanics. This respiratory protection is mandatory at this location for all exposures to asbestos-containing material. Two types of protection are possible.
 - 4.5.1 Normal Exposure: This is where the concentration of asbestos fibers is reasonably expected to be less than 10 times the permissible exposure limit. In this case, use the Comfo II respirator with the Type H Ultra Filter.
 - 4.5.2 Heavy Exposure: This occurs when the concentration of asbestos is reasonably expected to exceed 100 times the permissible exposure limit. In this situation, a type "C" supplied air respirator in the positive-pressure mode shall be used along with a full facepiece mask.
- 4.6 Wetting of asbestos-containing material will be done in such a manner as not to wash the fibers into the ground, drainage trenches or sewer facilities. Any fibers contacting the ground will be gathered up and disposed of in approved containers.
- 4.7 Special wetting agents for asbestos-containing material are available in the Sistersville Plant Store Room. This material is designed to bind the asbestos fibers and reduce or eliminate the potential of dust generation. This wetting material will be used where practical.
- 4.8 A special Vacuum Cleaner is available, with a special filter designed for 99.97% efficiency. This vacuum cleaner will be used where wetting is not appropriate, such as brake lining work, inside of structures, etc., and for removal of any asbestos-containing material on one's clothing.
- 4.9 Disposable Protective Clothing designed for exposure to asbestos-containing material will be used on all jobs involving the handling or removal of material containing asbestos.
 - 4.9.1 Disposable Protective Clothing will be worn prior to contact with asbestos-containing material.
 - 4.9.2 Disposable Protective Clothing will be removed at the work site and placed in approved containers.
 - 4.9.3 Protective Clothing will be removed prior to coming in contact with other personnel, eating, smoking or using facilities used by other personnel.

- 4.9.4 New Protective Clothing will be worn for each job or continuation of the job if the previously used Protective Clothing was removed.
- 4.10 Asbestos-containing material, including used disposable protective clothing, will be collected in impermeable, sealed bags or containers that are labelled according to Paragraph 4.12.
- 4.10.1 Within the shift that the job is completed, the craftsman or whoever collected the waste material will deliver the bags or containers to the asbestos waste area.
- 4.10.2 The appropriate supervisor will then notify the Contractor (Charlie Brown) within the same shift that asbestos waste has been delivered for burial.
- 4.10.3 The Contractor will bury the waste in compliance with federal regulations within 24 hours of being notified.
- 4.11 Contaminated clothing will be collected and transported in sealed impermeable bags or closed containers, properly labelled as described in Paragraph 4.12. This clothing will be sent to a commercial laundry which has facilities for handling asbestos contaminated clothing.
- 4.12 Disposal Containers or Laundry Bags shall read:

- Caution -

Contains Asbestos Fibers Avoid Breathing Dust Breathing Asbestos Dust May Cause Serious Bodily Harm
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- 4.13 When an employee has clothing (other than disposable type) contaminated or suspected to be contaminated with asbestos, the employee will:
- 4.13.1 Enter the "dirty room" facility provided for insulators and remove clothing.
- 4.13.2 Contaminated clothing will be placed in sealed containers and sent to laundry.
- 4.13.3 Enter the shower facility to wash off all asbestos fibers.
- 4.13.4 The employee will next enter the "clean room" facility and put on clean/uncontaminated clothing.

July 17, 1984

TO: T. L. Collins

COPY TO: R. E. Gardner
C. P. Maxwell
D. R. Paugh

FROM: L. R. Noble

SUBJECT: OSHA Compliance Officer Inspection
K/O Valley Construction Department at
Sistersville Plant - Asbestos Removals
May, 1984

On Wednesday, May 16, 1984, Robert J. Clifford, III an Industrial Hygienist with the Occupational Safety and Health Administration (OSHA), visited the Sistersville Plant as the result of an Environmental Protection Agency (EPA) Asbestos Removals/Demolition Referral. Earlier this year the Sistersville Plant had disclosed to the EPA that they would be initiating asbestos removal projects in their plant beginning some time in the first quarter. In accordance with an OSHA Experimental Inspection Program for asbestos in construction/demolition work, the EPA referred this report to OSHA which prompted this inspection.

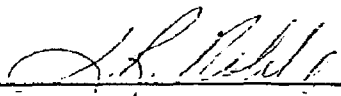
At the time of his visit, some five months after the EPA referral, the Kanawha/Ohio Valley Construction Department was still engaged in this asbestos removal work. Consequently, Mr. Clifford was interested in inspecting Construction Department work areas and examining Construction Department asbestos related procedures, programs, and OSHA documents.

The Construction Department was not engaged in asbestos removals on the day of Mr. Clifford's visit (May 16, 1984), therefore, Mr. Clifford's inspection was limited to a conference with Sistersville Plant and Construction Management representatives and a brief interview with two hourly Construction Department employees.

No citations were issued as a result of this inspection; however, OSHA did issue a letter to Mr. C. P. Maxwell on June 10, 1984, recommending that in the future OSHA 101 entries must reflect the definitive diagnosis of a medical doctor, i.e., asbestosis, silicosis, etc. A copy of the letter is attached. You will also find attached a more precise summary of the events surrounding Mr. Cliffords' visit. We will be happy to review this summary and discuss future action steps with you at your convenience.

At this time no entries on Construction Department OSHA Forms 101 and 200 have been revised or modified and no additional pneumoconiosis entries have been made.

If you have any questions regarding this OSHA inspection or the attached summary, please feel free to contact me at extension 5147 or C. P. Maxwell at extension 4335.



/ L. R. Noble

LRN:nt
3493A

- o Clifford, arrived at the Sistersville Plant at approximately 11:45 a.m. on Wednesday, May 16, 1984.
- o C. A. McNeil, the Sistersville Plant Safety and Health Department Head, received him at 12:00 noon and immediately arranged a conference that was attended by the following people:
 - W. V. Summers - 380 Assistant Plant Manager
 - C. A. McNeil - 380 Safety and Health Department Head
 - W. Besserman - 380 Industrial Hygienist
 - J. B. Mickey - 380 Employee Relations/Safety and Health Manager
 - H. H. Price - 511 Construction Department Superintendent
 - R. J. Clifford, III - OSHA Compliance Officer
- o Mr. Clifford opened the conference by stating that he was present due to a referral from the E.P.A. This referral resulted from the Sistersville Plant's letter declaring that asbestos insulation removal work would take place at this site.
- o Mr. Clifford was informed that the K/OV Construction Department was performing this asbestos removal work for the Sistersville Plant. There was no asbestos work in progress on the day of Mr. Clifford's visit (May 16, 1984).
- o Mr. McNeil contacted the Construction Department and H. H. Price a Construction Supervisor was requested to attend the conference as the Construction Department representative. J. W. Karn, the Construction Superintendent on this project was on vacation at the time.
- o Mr. Clifford asked Mr. Price questions regarding Construction Department policies and practices relating to: protective clothing, eye protection, head protection, respiratory protection, enforcement of safety policies and procedures, and safety meetings.

- o Mr. Clifford also requested to examine the Construction Department's OSHA Form 200 (Log and Summary of Occupational Engineers and Illnesses) 1981-1984, Respiratory Protection Program, and Asbestos Training Program. L. R. Noble of the Technical Center Safety Department told Mr. Clifford via telephone that copies of these documents are maintained at the Sistersville site, and he could see those copies, or the original documents would be available to him when he returned to his Charleston, WV, office. Clifford did not see the information he requested until Wednesday, May 23. It was later verified that all documents requested by Clifford were on file in J. W. Karn's office.
- o Mr. Clifford requested to interview Construction Department employees. He interviewed, at the same time, Construction Insulators L. R. Shaffer (#317) and R. A. Angel (#8550). This interview was conducted at the Construction Office Complex conference room. Wayne Bosserman of the Sistersville Plant I. H. Department, Clifford, Shaffer, and Angel were the only ones present during the interview. Herb Price was unable to attend due to a concrete pour in progress in the plant. This interview began at 1:45 p.m. and was completed by 2:00 p.m. Mr. Bosserman reported that several subjects were discussed during this interview, specifically: training, change rooms, showers, and work practices.
- o Mr. Clifford left the plant at approximately 2:10 p.m. Prior to leaving the plant Clifford told C. McNeil that he would contact L. R. Noble of the Technical Center Safety Department on Friday, May 18 or Monday, May 21 to report to us how he wanted to proceed with this inspection.
- o Mr. Clifford did not contact Mr. Noble on May 18 or May 21.

- o On Tuesday, May 22, at 10:30, L. R. Noble and C. P. Maxwell of the Technical Center Safety Department contacted Mr. Clifford at his Charleston office to request a status report on his inspection. At this time he requested to meet with us to see the following Construction Department documents:

- OSHA Log 200 - 1981, 1982, 1983, and 1984
 - Respiratory Protection Program
 - Asbestos Training Program

- o On Wednesday, May 23, at 9:50 a.m. C. P. Maxwell and L. R. Noble met with Mr. Clifford at Building 725, the Safety Department at the South Charleston Technical Center (P. G. Graham and M. L. Mills of the Technical Center Safety Department also attended this conference as observers). In this meeting Mr. Clifford was permitted to see the following:

- OSHA Log 200 - 1981, 1982, 1983 and 1984
 - The Technical Center Respiratory Protection Program
 - Asbestos Training Outline/Documents
 - Construction Department/Work Exposure Hours for 1981-1984

Mr. Clifford also requested, and was permitted to see the slide and tape presentation used in our asbestos training sessions. This is a 13 minute Union Carbide presentation entitled "Working With Asbestos".

- o In this meeting on May 23, Mr. Clifford made comments or ask specific questions regarding:

- Change Room and Shower Facilities - He stated that based on our monitoring data our people were not exposed to asbestos in excess of the permissible exposure levels and we, therefore, did not have to provide these items. However, they were beneficial in preventing exposure, especially to family members.

- Special Eating Areas - Same response as previous item; permissible exposure levels were not exceeded, therefore, special eating areas were not required.

Disposal Bags - He stated the mill thickness was not printed or visible on the bag and cautioned us to make sure our bags were a minimum of 4 mils thick.

Procedure - Mr. Clifford requested copies of Asbestos Procedures for both the Construction Department and the Sistersville Plant. He was issued only a copy of the Construction Procedures. L. R. Noble informed Clifford that we could not provide him a copy of another locations procedure unless they approved. He did not ask us to pursue the matter.

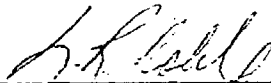
OSHA Log 200 - Mr. Clifford questioned why the term pneumoconiosis was used on the log to describe the nature of the employees illness, instead of the specific disease (asbestosis, silicosis, etc.). Mr. Noble informed him that this term was used for both asbestosis and silicosis cases diagnosed during this period and was done so at the instructions of UCC Medical Staff physicians.

- o Mr. Clifford stated that everything appeared to be in order and that he would be back in touch with us in a couple of days. He left the Technical Center at 10:50 a.m.
- o On Friday May 25, 1984, C. P. Maxwell called Mr. Clifford who was not available, so he spoke with Mr. Keily Parker the Industrial Hygiene Supervisor for OSHA at the Charleston, WV office. Mr. Parker informed Maxwell that Mr. Clifford would make arrangements to return to the Tech Center to see our OSHA form 101's for the year 1981. He was requesting only 1981 form 101's because this was the only year that Pneumoconiosis entries were made on the OSHA Form 200 Logs for the years that he requested.
- o On Tuesday, May 26, 1984, at 2:00, Mr. Noble took the OSHA Form 200 Log and Supplementary Form 101 for the year 1981 to the OSHA office in Charleston, WV. Mr. Clifford at that time reviewed both documents.

- o Mr. Noble asked Clifford at that time if he saw any problems with these two forms. Clifford's response was, "pneumoconiosis was a very broad term and did not identify an employees specific lung disease or condition." Clifford then questioned the use of this term on the 101 Form. He was not sure if the two diseases were distinguishable and would therefore, have to investigate the matter further. Mr. Clifford stated that they were seeking an opinion on this matter from their supervisors in the Regional Office in Philadelphia and the BLS. He also stated that they may seek the opinion of a third party "expert". His major concern was an employees access to information on the specific nature of the disease that was reported.
- o Mr. Noble informed Clifford that any employee request for specific medical data/opinion would be addressed by UCC Medical personnel. Any employee who requested to see the OSHA Forms 200 or 101 would be advised to consult with the company physician regarding the specific nature of his/her condition and therefore, this broad term was used for reporting purposes. This meeting lasted approximately 30 minutes.
- o On Wednesday, May 30, 1984, at approximately 8:30 a.m., L. R. Noble contacted Mr. Keily Parker by telephone to request another meeting with Mr. Clifford and Parker to discuss in greater detail the guidelines and criteria used to report asbestosis and silicosis cases on OSHA forms, and also to discuss in greater detail the success and effectiveness of the Construction Departments overall asbestos removal program.
- o By telephone on the morning of May 30, Mr. Parker informed Mr. Noble that he had contacted the Bureau of Labor Statistics (BLS) for their opinion on the use of the term pneumoconiosis on the OSHA Form 200 and 101. He informed Mr. Noble that he was to receive a response that morning (May 30) and he preferred to analyze the BLS opinion prior to any further meetings on the subject. He went on to say that "if any problem did exist it would be considered very minor and there would probably not be any citations issued". Mr. Parker stated his primary concern was future reference to the use of this term on OSHA Report forms.

- o At 1:35 p.m. on May 30, 1984, Mr. Parker telephoned L. R. Noble and informed him that:
 - 1. There would be no citation issued in this case because the statute of limitations had expired and because of the non-serious nature of the case.
 - 2. He (Parker) intends to prepare and issue a letter to the Construction Department that summarizes their findings on this matter. He also intends to outline the OSHA opinion that the specific medical physicians diagnosis shall be described on the Supplementary Record of Occupational Injuries and Illnesses (Form 101) and this description of the illness should be the same as the description in the employee's medical file.
 - 3. Mr. Parker stated that the broad term "pneumoconiosis" was acceptable for the OSHA Log, Form 200, but not Form 101.
- o Mr. Noble informed C. P. Maxwell of OSHA decision on May 30, 1984 at 1:50 p.m.
- o On May 31, 1984, L. R. Noble sent a letter to Dr. B. H. Avashia of the Institute Plant Medical Department and Dr. R. G. Rowe of the Technical Center Medical Department. The purpose of this letter was to request the specific medical diagnosis (illness) of all Construction Department employees currently listed on OSHA Form 200 as having pneumoconiosis. Avashia and Rowe have both responded to this request. Dr. Avashia identified all cases as "asbestosis". Dr. Rowe responded to a total of ten cases, he diagnosed five as "asbestosis", four as "possible pleural changes" due to asbestos exposure" and one as "pleural changes due to asbestos exposure with possible early asbestosis".
- o On June 21, 1984, C. P. Maxwell received a letter prepared by Perry D. Jones the OSHA Area Director (see attached letter).
- o No action regarding Construction OSHA Forms 101 or 200 has been taken at this time (July 12, 1984).

- o Throughout this case, L. R. Noble and C. P. Maxwell kept all Construction, E&TS, and Corporate Safety and Health components informed and up-to-date on all related matters.



L. R. Noble

LRN:nt

U.S. Department of Labor

Occupational Safety and Health Administration

550 Egan Street - Room 206
Charleston, West Virginia 25301
Reply to the Attention of:

(304) 347-5937



June 20, 1984

RECEIVED

JUN 21 1984

SAFETY DEPT.

Mr. Charles P. Maxwell
Safety Director, Technical Center
Union Carbide Corporation
P.O. Box 8361
South Charleston, West Virginia 25303

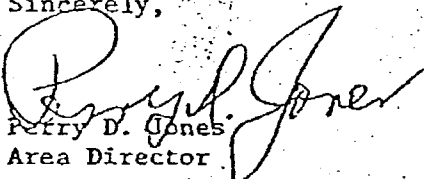
Dear Mr. Maxwell:

During a recent inspection at the Sistersville, West Virginia plant, our compliance officer requested that OSHA 200 forms be provided for his review. Since the forms were maintained in Charleston, it was several days before this review took place. An OSHA 200 entry for May 21, 1981 indicated that some employees had been diagnosed with "pneumoconiosis" and no further definitive etiology was noted. Upon further investigation, our compliance officer found that the OSHA 101 forms which correlated to the OSHA 200 entries had "pneumoconiosis" again listed as the diagnosis; the individual medical records, however, have "asbestosis" listed under diagnosis.

Our Regional Tech Support Group was contacted regarding the adequacy of your recordkeeping and we were informed that "pneumoconiosis" is correct when recording an OSHA 200 entry, but that the OSHA 101 associated with that entry must reflect the final diagnosis of the physician and in this case that determination was "asbestosis."

We would recommend then that future OSHA 101 entries or worker's compensation form entries reflect the definitive diagnosis of a medical doctor.

Sincerely,


Perry D. Jones
Area Director

McNeil - Notes



OSHA

Record To File
5/16/84

U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

550 EAGAN ST., ROOM 206
CHARLESTON, WV 25301

O.S.H.A. Visit
Robert J. Clifford
Industrial Hygienist

INDUSTRIAL HYGIENIST
ROBERT J. CLIFFORD, III

387-5317
304-246-6104
EXT-100

Arrived at our location at approximately 11:45 AM and I met and received him at 12:00 Noon.

Present: W. V. Summers, Assistant Plant Manager
C. A. McNeill, Safety & Health Department Head
W. Bosserman, Industrial Hygienist
J. B. Mickey, Employee Relations/Safety & Health Manager
H. Price, D&C Supervisor
R. J. Clifford III, O.S.H.A. (Industrial Hygienist)
550 Eagan Street, Room 206
Charleston, WV 25301

Mr. Robert J. Clifford III opened the conference and stated his purpose for the visit.

Mr. Clifford informed us that he was here due to a referral from the E.P.A. to O.S.H.A. in relation to our letter of disclosure that we're into the process of removing asbestos at this location. This work is being done by our D&C group on-site at this location. (Plant 380 Sistersville).

We provided Mr. Clifford a copy of a memorandum from the Tech. Center Services dated Feb. 1, 1984, disclosing i.e. SUBJECT: Asbestos Monitoring of Construction Employee At The Sistersville Plant.

Questions asked of H. Price by Mr. Clifford:

Question	Answer
Type of protective clothing?	Disposable Coveralls
Type of eye protection.	Safety glasses or monogoggles.
Hard Hats?	Yes
Coveralls?	Yes
Type of Respirators?	Fresh air or Comfo II
What do we do if someone does not comply with our rules?	Appropriate Counseling/ Disciplinary action is taken
Do you have safety Meetings?	Yes

Who attends?

Hourly craftspersons

How often?

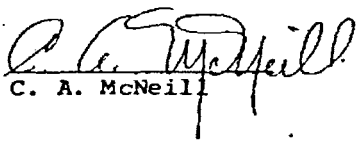
Weekly

Who conducts the meetings

Supervisors

Wayne Bosserman then accompanied Mr. Clifford and H. Price to the D&C construction office at 1:35 P.M. where Mr. Clifford interviewed two (2) of D&C's craftspersons from 1:45 P.M. to 2:00 P.M. who have been involved in asbestos removal. This session took approximately 15 minutes. Mr. Clifford left the plant at approximately 2:10 P.M.

Attested


C. A. McNeill

CAM/le

Asbestos Training Outline

1. Hazard of Asbestos
 - A. Review of Hazards
 - ** - What You Should Know About Asbestos
 - ** - Asbestos Worker Health Alert
 - B. Review of Construction Experience
2. Procedure Review
 - ** - VIII-22 Asbestos Insulation Removal and Disposal
(Plants Procedure Where Necessary)
3. Slide and Tape Presentations
4. Respiratory Protection Training
(When Necessary)
5. Specific Project Review and Discussion
6. Question and Answer Period
7. * Chemical Unit Training - When Required
will be performed by Plant Representative

** Copies Issued To Employees

Wm. L. Garrison
Boston, Mass.
1840

SAFETY AND HEALTH TRAINING RECORD

TYPE OF TRAINING *Asst*

DATE OF TRAINING 5/23/85

LENGTH OF TRAINING 1 - 1/2 hr

INSTRUCTOR *A. L. Mills*

	EMPLOYEE NAME	PR#	CRAFT#	DOB	CSD	SUPERVISOR
1.	Keith Neal	7991	33	5-8-37	8-5-37	H. Price
2.	L.N. Walker	7814	39	9-7-57	9-25-77	H.H. PRICE
3.	H.H. Price	31378	49	10/7/28	2-25-47	JW BARNIA
4.	G.W. HARTMAN JR.	7795	39	2/16/52	3-14-77	H. PRICE
5.	Donald L. Penson	7427	39	10-24-52	8-25-74	H. Price
6.	J.C. Hubbard	8081	39	11-25-53	10-27-77	H. PRICE
7.	S.G. Gillispie	7393	39	2-2-55	5-17-74	LeRoy Price
8.	L.F. Coryen	7897	33	6-25-52	2-4-77	H. PRICE
9.	J.C. Coryen	7868	33	2-1-49	3-4-77	H. Price
10.						
11.						
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15.						
16.						
17.						
18.						
19.						

SPECIAL COMMENTS

Subjects: Hazardous
Asbestos

Respiratory
MSA Comp 2

CONSTRUCTION SAFETY DEPARTMENT

TRAINING RECORD

Type of Training

Date

Instructor

Asbestos
Jan 23, 1984
Molloy

Hazard of
Units
Monomer's
Steam Plant
Acc. 380

	NAME	EMPLOYEE NO.	CRAFT	SUPERVISOR
1.	Mark Frazier	8147	Insulator	Price
2.	PAULA ALLEN	8556	INSULATOR	PRICE
3.	RICK ANGEL	8550	INSULATOR	
4.	FRANK COBB	8135	INSULATOR	
5.	Richard Brown	8103	INSULATOR	
6.	Leslie L. Crider Jr	8547	INSULATOR	
7.	L. J. SPARR	7562	LABOR	
8.	M. D. COLEMAN	7611	LABOR	
9.				
10.	* Fit Test Method - 3M / Unipol			
11.	Oxygenated Fit Test			
12.	- (Saturated Saccharin)			
13.				
14.				
15.				
16.				
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				

Hazards of Asbestos
Asbestos Removal - Sistersville

Jan. 9, 1984

Name	Craft	Employee No.
T. P. Stewart	Insul.	8084
B. E. Kelly	Labor	7320
H. D. Anderson	Labor	7272
R. L. Pauley	Insul.	8158
L. R. Shaffer	Insulator	3117
R. L. Henderson	Insulator	8137
Sevillian		

We did this because the
 Plant used this respirator.

We would normally use
 the 3M-7710 Respirator

Respiratory Training Type: Conf II - M/S

Same employees

Hazard of Unit: Monomers } By W. B. Carson
 Steam Plant }

