

file Dorothy Bell

UNION CARBIDE CORPORATION
OLD RIDGEBURY ROAD, DANBURY CONN 06817
LAW DEPARTMENT

May 18, 1984

M. G. Manetti, Esq.
E3-251

Re: TSCA Section 8(c)

Dear Mary:

Attached is a copy of my report on vinyl chloride.

Sincerely,

Peter F. Davey

Peter F. Davey

PFD:oid

Attachment

cc: R. A. Butler, Esq. (w/att)

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 071998

**TSCA SUBSTANTIAL RISK/SIGNIFICANT ADVERSE REACTION REPORT**

Use of this form initiates a procedure for the orderly evaluation of those situations that might constitute (a) substantial risk to health or the environment as defined by Section 8(e) or (b) allegations of significant adverse reactions as defined by Section 8(c) of the Toxic Substances Control Act (TSCA). Failure to comply with the provisions of this law could lead to a civil penalty of up to \$25,000 for each day of noncompliance, one year in jail, or both. Proper and timely use of this form discharges any legal reporting obligations of individual employees.

INSTRUCTIONS FOR USE

Part I — Initial Report: This section is to be filled in and signed by the employee who initially discovers the potential substantial risk, his supervisor, or the TSCA Coordinator. Emergency incidents should be reported immediately, by phone, to your line supervisor. Emergency Transportation incidents should be reported, by phone, to 304-744-3487.

Part II — TSCA Coordinator's Report: Even if the situation is not judged reportable under 8(e), the TSCA Coordinator should submit a copy of his report to the Substantial Risk Evaluation Board Chairman.

PART I — INITIAL REPORT

1. Name of Chemical(s) Involved: allegedly vinyl chloride
2. Nature of Risk (Health or environmental effects): plaintiff's decedent developed brain damage and brain cancer resulting in his death allegedly caused by exposure to vinyl chloride sold by five different chemical companies while he worked at Union Carbide's Texas City plant from 1955 until 1981.
3. Additional Information (Attach any appropriate reports, test results, etc.):
See Law Files: Dorothy Bell v. Union Carbide Corporation, et al.

(Use separate sheet if more space is required.)

4. Emergency Incident? ☐ Yes ☒ No
5. Potential Risk Reported by: Peter F. Davey Danbury 6255
Name Location Tel.
6. Reporter's Relation to UCC: ☒ Employee ☐ Customer ☐ Contractor ☐ Other:
7. Employee Initiating Report (ORIGINATOR): Peter F. Davey Peter F. Davey 12616 5/10/84
Name Signature Employee No. Date
8. Employee Preparing Report (PREPARER): Peter F. Davey Peter F. Davey 12616
Name Signature Employee No.
9. Distribution ☒ Original to TSCA Coordinator: Name Mary G. Manetti Date 5/10/84
☐ Copy sent to ORIGINATOR ☐ Other:

PART II — TSCA COORDINATOR'S REPORT

1. Date Initial Report Received: _____
2. Coordinator's Comments on Initial Report: _____

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3. TSCA Coordinator: _____
Name Signature Employee No. Date
4. Distribution: ☐ Original sent to Substantial Risk Evaluation Board Chairman: Date _____
☐ Copy Sent to ORIGINATOR ☐ Copy sent to PREPARER ☐ Other: _____

PART III — SUBSTANTIAL RISK EVALUATION BOARD REPORT

1. Date TSCA Coordinator's Report Received: _____ ☐ Not retained for 8(c) records
2. Evaluation of Substantial Risk: ☐ 8(e) reportable ☐ Not 8(e) reportable* ☐ Retain for 8(c) records
Reasons: _____
3. Action(s): ☐ Retain for future consideration ☐ Reported to EPA on _____
☐ Retain for 8(d) reporting ☐ Other: _____
4. Distribution (Attach report to EPA, if submitted):
☐ Copy sent to ORIGINATOR ☐ Copy sent to PREPARER ☐ Copy sent to TSCA Coordinator
☐ Copy sent to Health, Safety and Environmental Affairs ☐ Other: _____
5. Chairman, Substantial Risk Evaluation Board: _____
Name Signature Employee No. Date

* Right to Report: If the Substantial Risk Evaluation Board's decision is not to report and the employee nevertheless wishes to report, he or she may do so directly to the Environmental Protection Agency. For assistance in preparing such a report, you may consult your Department/Facility TSCA Coordinator. According to Section 23 of the Toxic Substances Control Act, no employer may discharge or otherwise discriminate against an employee because he or she assisted or participated in an action to carry out the purposes of the Act.