WV-0237 #8

UNION CARBIDE CORPORATION
Silicones & Urethanes Intermediates — Sistersville, WV.

PLAINTIFF'S EXHIBIT
UC-2955

TO: A. W. Boyd
Wayne Watkins

SUBJ: Asbestos Insulation: Repairs/Removal

DATE: July 20, 1984

cc: George Wulfert

Please find attached a letter from George Wulfert, Maintenance Dept. Head, clarifying Sistersville's position on asbestos insulation repairs. The plant has been adhering to these guidelines; however, most repairs have necessitated complete removal of the asbestos due to the deteriorated state. This has been especially true in energy systems.

George's letter addresses the concerns raised at the OP Tech meeting; if there is a need for additional information, please let me know.

Very truly yours,

Bill Summers

W. V. Summers, Jr.

WVS/sr
Attachment

UNION CARBIDE CORPORATION
Silicones and Urethane Intermediates — Sistersville, WV

MEMO TO: W. V. Summers

COPY TO: A. W. Boyd
Department Heads
1st Line Maintenance Supervisors
2nd Line Maintenance Supervisors
Maintenance Coordinators

DATE: July 18, 1984

SUBJECT: Sistersville Plant Philosophies and Guidelines for Maintaining/Removing Asbestos Insulation

Following is the Sistersville Plant's philosophy concerning asbestos insulation:

"The Plant does not intend to enter into a program for the wholesale removal of installed insulation for no other reason than that it contains asbestos."

Reasoning:

In many cases the risks created by the removal would far exceed any which would arise if the insulation were left in place effectively sealed.

Maintenance Guidelines:

(1) If the installed asbestos insulation has damage that can be patched, and sealed, do it rather than complete removal.

(2) If the installed asbestos insulation can be effectively sealed, do it versus replacement.

(3) If a repair job on pipe, equipment, or a tank requires the removal of asbestos insulation in order to get at the work, then replace the asbestos insulation with approved, non-asbestos type insulation. Proper procedures must be followed during the removal, and proper disposal methods used for the asbestos insulation.

(4) Maintenance Coordinators should fill out their Shop Order requests with all the above in mind.

Clarification of the Safety & Health Insulation Capital Project:

"This project provides for the upgrade of critical insulation in the Steam Plant and Monomers Areas. Existing exposed asbestos insulation will be repaired or replaced to insure a weatherproof system and correct the safety and health concern of exposed airborne asbestos."

Many believe this project was for the "elimination of asbestos insulation" and this is not the case. It turns out that much of the insulation is beyond repair, and for this reason is being replaced.

George W. Wulfert

George W. Wulfert
Maintenance/Materials
Management Dept. Head

GWW/tas