PLAINTIFF'S EXHIBIT
UC-2129

BUSINESS CONFIDENTIAL

UNION CARBIDE CORPORATION

ENGINEERING, MANUFACTURING AND TECHNOLOGY SERVICES DEPARTMENT
HEALTH, SAFETY AND ENVIRONMENTAL TECHNOLOGY
SOUTH CHARLESTON, WEST VIRGINIA

M E M O R A N D U M

May 19, 1987

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FROM: L. S. Magelssen
H. W. Wegert

SUBJECT: Health, Safety, and Environmental Review
Asbestos Insulation Removal Upgrade - Phase I
South Charleston

The Insulation Upgrade Project at South Charleston was reviewed by CED's Health, Safety and Environmental Technology Section and recommended for endorsement on October 30, 1986 (see attached). Since that review OSHA Regulation 29 CFR 1926.58 has been promulgated (January 16, 1987), significantly increasing the cost of removing and repairing asbestos insulation due to increased job preparation, execution, and cleanup requirements. Negative pressure enclosures are required "where feasible" for large scale removal, demolition, and renovation operations.

The long-term plan is to remove asbestos insulation from idle equipment, replace damaged asbestos insulation with an approved type, and seal all remaining asbestos insulation. This Phase I project is a working budget project to be completed in 1987 for work on the asbestos insulation that presents the highest exposure potential to employees. Subsequent projects over the next few years are planned to complete this upgrade program.

Project executions will be in compliance with all applicable OSHA and EPA Regulations including the recently enacted OSHA 29 CFR 1926.58. The EPA will be notified that the removal of asbestos insulation could occur at the South Charleston Plant. Removed asbestos insulation will be disposed of at the Goff Mountain Landfill.

Endorsement of this project is recommended contingent upon the following:

1. Maintenance Procedures XVIII Provisions for Asbestos Material Removal and Disposal Safety be revised to be in compliance with the latest OSHA Standards 29 CFR Parts 1910.1001 and 1926.58.

2. Procedure XVIII be revised in accordance with the environmental concerns listed in the attached October 30, 1986 review.

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