WJ-0140 #32

UNION CARBIDE

INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS • EP ENGINEERING P. O. BOX 8361, SOUTH CHARLESTON, WEST VIRGINIA 25303

To (Name) Mr. R. A. Huber - 511
Ms. M. G. Manetti - NYO,46
Mr. A. E. Montagna - NYO,21
* Mr. R. D. Stief - 511

Date February 24, 1977

Originating Dept. SHARE

Subject Proposed Action Plan for EPA Asbestos (Insulation) Regulation

Copy: Mr. N. W. Gaines - 511 (3002)
Mr. R. C. Hieronymus - 511
Mr. R. T. Kramer - 512
Mr. D. G. Moshier - 511
Mr. E. C. Powell - 511
Mr. M. D. Seymour - 511 (3002)
* Mr. B. H. Thomas - 511
Mr. D. T. Watters - 511

Gentlemen:

Over a period of several weeks Messrs. Kramer, Moshier, Powell, Seymour, and the writer have met to discuss whether the EPA Regulation on Hazardous Air Pollutants (40 CFR Part 61, Subpart B) applies to the removal and disposal of asbestos containing insulation (where asbestos content is greater than one weight percent—basically pre-1974 insulation) at Chemicals and Plastics locations, and if so, what actions are now appropriate.

This is a progress report on the six action steps outlined in my letters of 1/19/77 and 1/24/77. Principal addressees are requested to indicate agreement or suggested alternatives to action steps 4 and 5 discussed below in time for consideration at the next meeting on 3/8/77. A progress report on the action steps follow.

(1) Definition of "Friable" Asbestos - As reported in the 1/24/77 letter, insulation manufacturers believe that material (other than foamglass) purchased in past years (say earlier than 1974) would be included within the definition of "friable" asbestos and therefore subject to the regulation.

(2) Practices of Others - From further contacts with DuPont and Charleston and Houston insulation contractors, it appears that no one is providing notification to EPA for removal operations as required.

(3) Procedural Changes and Costs - Institute estimates added costs for compliance (i.e. wetting insulation prior to removal) at $15,000 per year. Seadrift is already complying. This appears to indicate an outside additional annual cost of $100,000 in C&P for compliance. Costs of notification would be minimal. Disposal costs should not be significantly larger than at present.

(4) Internal U/A for New Procedures - The group recommends that principal addressees agree that locations be advised to modify current removal and disposal practices to comply with regulatory requirements.

(5) Approaches to EPA - Following completion of action step (6) but prior to distribution of such guidelines to locations or their implementation, a contact will be made of a Regional EPA Enforcement Division to obtain their U/A. The target for this step is 4/1/77.

(6) Implementation - The applicable regulation sections along with interpretative guidelines will be distributed to C&P locations (Maintenance and Occupational Health Department Heads and Managers), C&P Construction, Engineering, and other appropriate parties. The target for this step is 5/1/77.

Sincerely,

F. D. Bess

FDB/klw

*Enclosures: Copies of 1/19/77 & 1/24/77 letters.

MDS File my copy Regulations Asbestos

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UNION CARBIDE CORPORATION
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JAN 24 1977
W. J. H.

MEMORANDUM

January 24, 1977

TO: N. W. Gaines
W. J. Hansen

FROM: M. D. Seymour

SUBJECT: Asbestos Insulation Removal Practices Meeting of January 21, 1977

Present at Meeting: F. D. Bess
R. T. Kramer
D. G. Mosier
E. C. Powell
M. D. Seymour

Discussion centered around the EPA regulation concerning Hazardous Air Pollutants (40 CFR 61). Since this regulation specifies asbestos removal and disposal schemes dealing with destruction and renovation, it was considered that UCC has a responsibility to comply with the dictates of this regulation.

Removal of all friable (definition: any material which may be crushed using hard pressure) asbestos is regulated. Nonfriable asbestos materials such as 2-inch woven asbestos tape are not regulated. Two materials containing asbestos are still in use (1) woven asbestos tape for insulating and (2) mastics containing short asbestos fibers. All other uses have been discontinued since 1974.

The prenotification provision of the regulation will be interpreted by UCC to allow for annual notification of anticipated insulation removal activities during the subsequent 12 months. Interim notification of the EPA would be possible if significant change was expected in the asbestos removal plans.

Action to be taken by members:

1. F. D. Bess and R. T. Kramer will form an interpretation of the regulation and submit it to the Legal Department.

2. E. C. Powell will continue to contact other people in various industries to assess overall compliance with this regulation.

3. D. G. Mosier will assess the "cost to comply" based on the interpretation from Messrs. Bess and Kramer.

Environmental Protection concerns revolve around disposal methods which are clearly outlined in the regulation. A fenced area is specified with requirements for signs warning of possible asbestos exposure.

A follow-up meeting has been scheduled for Friday, February 11, 1977, at 1:00 p.m. in Building 701, Room B20.

Mike

MDS/jgh

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JAN 20 1977

N. W. GAINES

CHEMICALS AND PLASTICS • P. O. BOX 8361, SOUTH CHARLESTON, WEST VIRGINIA 25303

To (Name) Mr. Peter Barna - 512
Mr. N. W. Gaines - 511
Mr. R. C. Hieronymus - 511
Mr. R. A. Huber - 511
Ms. M. G. Manetti - NYO,46
Mr. A. E. Montagna - NYO,21

Copy Mr. R. T. Kramer - 512
Mr. D. G. Moshier - 511
Mr. E. C. Powell - 511

Date January 19, 1977

Originating Dept. SHARE - Environmental Protection

Subject Asbestos Containing Insulation Removal Practices

Gentlemen:

It has recently been recognized by Mr. Moshier and associates that EPA regulations on Hazardous Air Pollutants (40 CFR 61) apply to the removal of old pipe and equipment insulation containing friable asbestos.

The regulations appear to require pre-notification of the Agency for insulation removal, procedures during removal that are different and more complex than now being used, and standards for disposal and disposal areas that are not currently being observed.

Messrs. Kramer, Moshier, and Bess met on January 7, 1977, to discuss the regulation and formulate a tentative action plan. In the course of the meeting there were telephone consultations with Messrs. Barna and Powell. It was decided the tentative plan would be further refined at a January 21 meeting. 701-820 1:00 PM

The action plan steps are:

(1) Contact (prior to 1/21/77) insulation manufacturers to clarify the definition of "friable asbestos", since this is the only type regulated. Ernie Powell will do this. If our old insulation is not classed as friable, action plan would end.

(2) Determine practices of other large companies prior to 1/21/77. Ernie Powell to do. (NOTE: Ernie has good relations with insulation experts in companies to be contacted. Otherwise this step would have awaited more internal assessment of needed actions and costs.)

(3) Roughly assess costs and procedual changes to meet apparent compliance requirements. Moshier will assess this matter for dismantling operations, EP Team for disposal.

(4) On basis of above actions, obtain internal U/A (including Law Department) to proceed with balance of plan.

(5) Discuss proposed new practices with EPA to obtain their agreement.

(6) Implement necessary procedures.

Comments or suggestions from any addressees would be appreciated.

Sincerely,

F. D. Bess

FDB/klw

WU-0140 #34

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ASBESTOS

California adopts interim asbestos rules. The California OSH Board has adopted interim regulations covering employee notification, monitoring and medical exams for asbestos exposure. These interim regulations were made at the request of federal OSHA and became effective October 28. The state's new Asbestos Advisory Board and the Standards Board plan to review the entire package of California asbestos regulations in early 1977 following scheduled public hearings.

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From OSH DIGEST
DEC. 1976