



INTERNAL
CORRESPONDENCE

PLAINTIFF'S
EXHIBIT

UC-P-147

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC.
POLYOLEFINS DIVISION • SEADRIFT

TO: J. N. Dermit

COPY: F. H. Bowen
G. M. Brou
R. K. Howell
A. R. Marcinkowska
M. V. Ward

Your Copy

DATE: September 22, 1992

SUBJECT: ON-SITE ASBESTOS IDENTIFICATION JUSTIFICATION

Although a considerable amount of asbestos containing material has been removed at this location, the task of identifying asbestos has increased. Partial removals and replacing with non-asbestos insulation has created situations where both types of material may be found on the same line or piece of equipment.

Whenever insulation cannot be positively identified as being asbestos free, it must be treated as asbestos containing material, until proper identification is made. This is accomplished by analyzing a sample of the material in question.

The present response time of 24 to 48 hours from the time a sample is obtained to receiving an analysis causes many jobs to be treated as asbestos containing material.

The Maintenance Department receives an average of four (4) requests per week for asbestos identification on lines or equipment needing work. Approximately one-half (1/2) of these jobs will be delayed awaiting sample results. The ones that cannot be delayed are treated as asbestos containing material. Sample results of these jobs indicate that approximately 50% did not contain asbestos. This means that an average of one (1) job per week is treated as asbestos when it was not.

Since other work cannot be done in a regulated area where asbestos abatement is being performed, this shuts down other work, unnecessarily. This creates scheduling problems with other crafts and increases the need for overtime to maintain schedules for production.

021537

Mr. J. N. Dermitt
September 21, 1992
Page 2

Due to the fact that asbestos abatement creates more waste to be disposed of (plastic, glove bags, disposable coveralls, etc.), landfill usage is increased.

Enclosures for asbestos abatement require negative pressure to be maintained during asbestos removal and until a final clearance sample is obtained and analyzed. These enclosures have to be monitored by an asbestos trained person until the proper final clearance analysis is received. This requires a "hot shot" of each sample to an approved laboratory. Presently, this adds approximately five (5) hours, or longer if the samples are sent by normal means, to the time that the integrity of the enclosure must be maintained. These enclosures are built of reinforced plastic and are susceptible to wind damage, therefore, any delay increases liability to potential asbestos exposure.

Asbestos enclosures built during unit shutdowns greatly affect the shutdown schedule, therefore, any delays at this time become critical.

Pipe insulation in some units is in very poor condition and frequently is found on the ground. The inability to quickly identify whether this material contains asbestos increases the liability of an asbestos exposure and creates undue concern to employees working in those areas.

During the first eight (8) months of 1992, the Brown & Root Maintenance Asbestos Crew has sent 300 bulk samples and 225 personnel samples for asbestos analysis.

Due to unit request, these figures are projected to increase to 450 bulk samples and 765 personnel samples by the end of the year. It is anticipated that 500 bulk samples and 900 personnel samples will be needed in 1993. Samples will still be required past 1993, but the quantities cannot be estimated at this time.

There have been six (6) enclosures done to date. Four (4) more are estimated for the remainder of the year for a total of ten (10). This total will probably increase to approximately twenty (20) in 1993, due to the Olefins II needs.

Listed below are actual and estimated costs of analyzing samples of suspected asbestos containing material by an outside laboratory. These figures do not reflect the costs incurred by production losses, additional manhours expended, and potential liability expenses caused by the delays in having to wait for analysis results.

021538

Mr. J. N. Dermit
September 21, 1992
Page 3

Through August, 1992:

300 bulk samples @ \$15	=	\$4,500	
225 personnel samples @ \$15	=	3,375	
21 requisitions @ \$50	=	1,050	
Sample Analysis Cost	=		\$ 8,925

Projected 1992:

450 bulk samples @ \$15	=	\$ 6,750	
765 personnel samples @ \$15	=	11,475	
32 requisitions @ \$50	=	1,600	
Projected 1992 Sample Analysis Cost	=		\$19,825

Projected 1993:

500 bulk samples @ \$15	=	\$ 7,500	
900 personnel samples @ \$15	=	13,500	
52 requisitions @ \$50	=	2,600	
Projected 1993 Sample Analysis Cost	=		\$23,600

Fred A. Berger

FAB:wg

Berger/Remond

021539