PLAINTIFF'S EXHIBIT

UC-2324

UNION CARBIDE

INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION P. O. BOX 8004, SOUTH CHARLESTON, WV 25303
SILICONES AND URETHANE INTERMEDIATES
SOUTH CHARLESTON PLANT

To (Name) W. S. Walker
Division
Location
Area

John Dean, et al
Need to discuss in staff & fyi

Copy to E. P. Contacts
P. D. Gossage
Sal Rossi
F. A. Sanchez
J. L. Worstell
W. R. Yerkey

Date January 9, 1985

Originating Dept. Environmental Regulations

Area

Subject EPA Asbestos Regulations

Ref: Letter, F. A. Sanchez to R. E. Peele, et.al., "Asbestos Standards Applicable at 514 Plant", May 30, 1984.

Bill

On May 30, 1984, F. A. Sanchez sent you a letter summarizing the EPA standards for asbestos. The purpose of this letter is to highlight some of the more important aspects of those standards.

All demolition and/or renovation activities which involve asbestos must be reported in advance to the EPA. Plant 514 will submit three types of notifications. (1) A letter will be sent to the EPA each year covering routine miscellaneous maintenance operations (renovations). A letter has already been sent for 1985. (2) Any large scale maintenance jobs (renovations) must be reported separately. For instance, the stripping of several hundred feet of line for repairs would fall under this classification. (3) Any demolition activities must be reported by a separate letter.

In order for EPD to submit notification letters on time, we must be kept informed of any anticipated large scale renovations and any demolition work. To meet the EPA deadlines, EPD must be notified thirty days before any job is scheduled to begin.

Removal of asbestos must follow EPA criteria which generally prohibit any emissions of asbestos during the removal operation. This will usually involve thorough wetting prior to removal and sealing asbestos in leak-tight, labelled containers. Removed asbestos is not to be dropped or thrown to the ground as this will cause the release of asbestos fibers into the air.

Once the asbestos is bagged for disposal, it should be promptly transported to Goff Mountain for disposal. A properly prepared mainifest is required. One of the deficiencies noted during the Corporate Audit during August was our lack of prompt disposal of removed asbestos. Trucking must be kept aware of jobs involving asbestos removal so that prompt disposal can be made. No job should be considered complete until disposal has been accomplished.

Departments which have ongoing maintenance jobs involving asbestos should monitor the worksite daily to assure the prompt disposal of removed asbestos. "Orphan" bags of asbestos must be called to the attention of Trucking promptly to avoid a repeat of the situation discovered in August. Each Department must be responsible for avoiding any accumulation of removed asbestos within its area.

Very truly yours,

J. R. Soice

JRS/lms
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