

ETHYL CORPORATION

INTER-OFFICE

TO: Division and Facility Managers

FROM: G. L. Ter Haar ADDRESS: BR Tower 6

SUBJECT: Corporate Asbestos Management Policy DATE: December 15, 1989

Asbestos-containing materials are present in most of Ethyl's manufacturing facilities and in some office buildings. As long as asbestos is present, it is essential that a highly effective program be maintained to assure that no excessive exposures to personnel or the environment occur. Federal, state, and local regulations get more complex each year. At the same time, it becomes more critical that we have a uniform standard of care regarding asbestos throughout all of our facilities.

To help assure that we meet our responsibilities regarding asbestos, the attached corporate asbestos management policy is now in effect. The implementation and maintenance of an effective asbestos program is clearly the responsibility of each facility manager. The corporate asbestos policy establishes a committee that is intended to serve as an information resource to assist in compliance. One of the duties of the corporate committee is to conduct periodic audits of asbestos management programs at each facility.

Please review your asbestos programs to assure that they are in compliance with the corporate policy.

G. L. Ter Haar
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CORPORATE ASBESTOS POLICY

1. It is the policy of Ethyl Corporation to handle and manage asbestos and asbestos-containing materials (ACM) in a manner that will protect employees' health, the community and the environment. The minimum standard for each facility is conscientious compliance with all federal, state and local laws and regulations pertaining to asbestos.

2. It is the responsibility of each facility manager to assure that asbestos-containing materials are properly maintained, handled or removed. To provide oversight, uniformity and consultation in the management of ACM throughout the corporation, a Corporate Asbestos Management Committee is established. This committee has seven member representing the disciplines involved with ACM management.

Chemicals Group Manufacturing
General Engineering
Industrial Hygiene
Environmental Affairs
Law Department
Medical Department
Corporate Real Estate

The Industrial Hygiene or Environmental Affairs representative will act as chairman of the committee.

The duties of the Corporate Asbestos Management Committee will include:

- (a) Coordinate and assure compliance with the Corporate Asbestos policy.
- (b) Provide consultation service on asbestos issues for all Ethyl facilities.
- (c) Periodically audit ACM management at each location.
- (d) Review and approve planned asbestos removal or abatement contracts at all locations.
- (e) Consult on asbestos issues in new acquisitions and leases.

3. All corporate facilities must be inspected for asbestos-containing materials by a qualified person, and where asbestos materials are identified, a specific asbestos management program shall be prepared. The program will define the long-range strategy for abatement and/or maintenance of ACM in the facility.

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4. The presence of ACM and the hazards of asbestos will be addressed in the Hazard Communication training for all operating employees. Maintenance and custodial staffs in each facility will be informed of the presence and location of ACM and will be instructed to properly notify supervision of any activity that will disturb ACM.

5. Any employee who will conduct an activity that will disturb ACM must be medically certified and trained in accordance with the OSHA asbestos standard for construction [CFR 1926.58].

6. All work involving ACM performed by outside firms will be conducted by contractors and/or consultants who have been approved by the Corporate Asbestos Committee.

7. To avoid any potential or perceived conflict of interest, consultants who monitor ACM projects must be clearly independent from the contractor and have no economic relationship with the contractor.

8. For planned projects involving ACM, specifications and a detailed work protocol will be required.

9. Each location will designate an asbestos coordinator. The asbestos coordinator will assure that all records required by Ethyl policy, EPA, OSHA, state and local regulations are maintained. These records will be kept indefinitely in a secure and permanent file.

10. No asbestos-containing materials will be purchased or used at any Ethyl facility. If a unique situation exists where no asbestos substitute can be found, a special request must be submitted to the Corporate Asbestos Management Committee to obtain approval to use an asbestos-containing material.

11. The responsible parties within Ethyl Corporation who make business decisions to buy, sell, lease or renovate facilities shall evaluate and consider the impact of asbestos-containing materials on the decision.

Responsibilities of Individual Facility Management
Regarding Asbestos-Containing Materials (ACM)

Each facility at which ACM is present will prepare an asbestos plan and use it as a guideline for managing ACM on a day-to-day basis. The Corporate Asbestos Management Committee will work with management at individual locations to review existing asbestos programs and consult on compliance with regulations and with corporate policy.

The following are examples of items expected to be addressed in the asbestos management programs documented at each Ethyl facility:

1. An asbestos policy statement for the facility.

2. A written report documenting the results of a formal asbestos-containing material [ACM] survey for the whole facility.
3. Drawings showing the location of all ACM on the site.
4. The procedure used for labeling all ACM.
5. The identification of the person designated as trained asbestos coordinator for the site. The level of training should be specified.
6. The procedure for alerting maintenance and custodial personnel to the presence of, and the mandatory action required for, ACM.
7. An outline of the training plan for employees who will work with ACM.
8. The decision logic for selecting asbestos contractors and the procedure for prequalifying contractors.
9. The identification of a qualified consulting laboratory to be used for ACM identification and monitoring analyses.
10. A statement of the decision logic used for determining whether a removal project is a small-scale, short duration job as referenced in the OSHA regulation [CFR 1926.58].
11. A definition of the method to be used to verify that a contractor is properly disposing of ACM removed from the site.
12. The designation of a secure file for storing all records relating to asbestos.
13. The triggers and procedure for notification of regulatory agencies as required by applicable federal, state, and local regulations.
14. Copies of all federal, state, and local regulations pertaining to asbestos.

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