

FILE NAME: Goodyear (GY)

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OH - OSHA & EPA Asbestos Standards

# THE GOODYEAR TIRE & RUBBER COMPANY

## STANDARD PRACTICE LETTER

AKRON, OHIO

PERSONNEL MANAGER  
DECATUR

SP. NO. 81-82

FO &amp; GO GENERAL NOTICE PLUS INTERPLANT

DELIVER  
TO:

DATE June 24, 1981

SUBJECT: ( I ) USE OF ASBESTOS - ( OSHA STANDARD 1910.93a )  
( II ) DISPOSAL OF ASBESTOS WASTE ( EPA STANDARD - CFR - 61 )

The handling and disposal requirements given in this memorandum apply only to friable asbestos material where fibers can or may become airborne. Such item as Goodyearite gasketing and asbestos reinforced plastics are not included unless the material has been altered or has deteriorated to where loose fibers are present.

### ( I ) OSHA

Asbestos fibers in the atmosphere have been determined to be a health hazard at concentrations exceeding an 8-hour time-weighted average of 2 fibers (longer than 5 micrometers) per cubic centimeter of air. Under Section 1910.93a (f) Monitoring, every employer, "where asbestos fibers are released," must undertake a monitoring-medical surveillance program of considerable expense and duration.

It is important that plants not manufacturing asbestos type products avoid being classified as an employer "where asbestos fibers are released" thus avoiding the necessity for implementing a program for monitoring airborne concentrations of asbestos fibers and subsequent medical surveillance of personnel so exposed.

Each facility where asbestos type products may now be incidentally used (ie, thermal piping insulation, building insulation, exposed insulating cover for tire builders' hot knife receptacles, etc) is to immediately avoid the obvious use of same. This includes the purchase of equipment incorporating exposed fibrous asbestos components subject to operating damage resulting in possible release of airborne fibers.

An area of particular concern relates to the need for implementing the proper procedures when removing and disposing of asbestos insulation. Herewith is the proper procedure for handling asbestos as recommended by Corporate Environmental Engineering, Corporate Safety and Corporate Industrial Hygiene.

ISSUED BY Department 110D APPROVALS

(Over)

| OFFICERS OF THE COMPANY | GENERAL MANAGERS          | SALES DIVISION       | COMPTROLLERS DIVISION | MANUFACTURING SERVICES | GEN COUNSEL & SECRETARYS DIV | INDUSTRIAL RELATIONS   | PUBLIC RELATIONS |
|-------------------------|---------------------------|----------------------|-----------------------|------------------------|------------------------------|------------------------|------------------|
| Tully                   |                           |                      |                       | Leary                  |                              | Hehir                  |                  |
|                         |                           |                      |                       | Moats                  |                              | Holtshouser            |                  |
|                         |                           |                      |                       |                        |                              | Cummings               |                  |
|                         | INTERNATIONAL CORPORATION | MATERIALS MANAGEMENT | TREASURY DIVISION     | PRODUCTION DIVISION    | RESEARCH & DEVELOPMENT       | MANAGEMENT ENGINEERING | OTHER            |
|                         |                           |                      |                       |                        |                              |                        | Betzhold         |
|                         |                           |                      |                       |                        |                              |                        | Burkett          |
|                         |                           |                      |                       |                        |                              |                        |                  |

A. Issuance and Distribution of an In-Plant Safety Standard Practice Letter Containing the Following Information:

Reference: Removing, repairing, and handling friable asbestos

When it becomes necessary to repair or remove friable asbestos material, personnel must use the following procedure:

1. Notify supervision
2. Rope off (barricade) the areas that could be contaminated by airborne asbestos fibers
3. Clear the area of all unnecessary employees
4. Around barricaded areas, place warning signs reading:

CAUTION

ASBESTOS DUST HAZARD. AVOID BREATHING DUST. WEAR ASSIGNED PROTECTIVE EQUIPMENT. DO NOT REMAIN IN AREA UNLESS YOUR WORK REQUIRES IT. BREATHING ASBESTOS DUST MAY BE HAZARDOUS TO YOUR HEALTH !!!!!

5. All employees required to work in the affected area shall wear an approved respirator.
6. If insulation is to be removed or worked in such a way that fibers may become airborne, the insulation shall be thoroughly wet down before removing or handling.
7. For all repair work, non-asbestos type insulation is to be applied.
8. When each job is complete or at the end of each work shift, whichever comes first, all material that has been removed shall be picked up and placed in an impermeable bag or metal drum and sealed and properly identified. (Material must be wetted before bagging and drumming?)
- \*9. Material is to be disposed of in accordance with the procedures outlined in Section II.
- \*10. When job is finished or at end of work shift, clothing shall be placed in an impermeable bag and sealed. Bag shall have the appropriate label applied after which it shall be sent out for proper laundering. Disposable clothing may be used as an alternative.

\* Warning sign or lable to read:

CAUTION

CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM.

June 24, 1981

(II) EPA Hazardous Air Pollutants - Asbestos (40 - CFR-61) (Copy Attached)A. Demolition and Renovation

1. Demolition or renovations involving friable asbestos material with a surface area of GREATER than 260 linear feet of piping insulation or 160 square feet of friable asbestos material (eg. reactors, boiler, ceiling insulation):

- Notification must be sent to the regional EPA office 20 days prior to starting the work. Detailed information must be supplied. (See Section 61.22(d) for details).

2. Demolition involving LESS than 260 linear feet of friable asbestos piping insulation or 160 square feet of friable asbestos insulation.

- Notification must be sent 10 days prior to starting the work. Minimal information is required. (See section 61.22(e) for details).

3. Renovation - involving LESS than 260 linear feet of piping insulation or 160 square feet of insulation.

- No EPA notification is required.

NOTE: Renovation excludes work where load bearing structural members are removed; demolition includes it. Therefore such items as removing piping insulation or reactor insulation or ceiling insulation do not require EPA notification unless more than 260 linear feet of piping insulation or 160 square feet of friable insulation is removed.

B. Notification

Notification required by EPA is to be handled by each plant. A copy of the correspondence is to be sent to Corporate Environmental Engineering.

C. Disposal

The procedure outlined in Section 61.22(j)(3)(i) must be followed.

This section provides an acceptable disposal procedure which includes wetting down any asbestos wastes and sealing them in a leak tight container for disposal in an approved landfill. Asbestos is not classified as a hazardous waste under the USEPA's RCRA (Resource Conservation and Recovery Act) regulations. However, most states have restrictions on which landfills can accept friable

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asbestos material. Also note that although this regulation does not require a metal drum or other rigid disposal container to be used, some state or areas (eg. Ohio) normally require that metal or rigid drums be used. Therefore, you should review local, applicable agency rules for restrictions and approved disposal sites.

Section 61.25 gives the criteria for the operation of a landfill site. Assurances should be obtained from the plant's waste contractor that the material is disposed of in the proper manner. If there are any questions, consult the local, applicable agency for details.

(III) Contractor Handling of Friable Asbestos

Then a contractor or other non-Goodyear person may be required to handle friable asbestos material, the same procedures outlined in I and II must be followed. This memorandum should be made part of the agreement we enter into with the contractor.