

~~C. F. Landhart~~
② Cmt

ASBESTOS CONFERENCE

TEXTILE FIBERS DEPARTMENT

NOVEMBER 17-18, 1983

RICHMOND, VIRGINIA

OUTSIDE CONTRACTORS

DUP 1010981

OUTSIDE CONTRACTORS

Question 1. Has your site dealt with an outside contractor in any aspect of asbestos handling (installation, removal, waste disposal, etc.)?

Cape Fear - Yes

Waynesboro - Yes

Cooper River - Yes

Chattanooga - Yes

Richmond - Yes

Seaford - Yes

Martinsville - Yes

Kinston - Yes

Old Hickory - Yes

Camden - Yes

DUP 1010982

DU 053024

Question 2. Describe briefly the job(s) handled by the contractor.

Cape Fear

- Most asbestos related jobs are performed by Daniels Construction.
- Removal of 4 oil-fired boilers (involved gross asbestos removal) was performed by Central Salvage, Inc. - Bala Cynwyd, Pa.

Waynesboro

- Demolition of acetate facilities.
- Insulation removal and repair - Brown and Root.
- Removal of insulation from salvage pipe.

Cooper River

- Renovation of a polyester exchanger and upflow pre-polymerizer.

Chattanooga

- Waste disposal.

Richmond

- Large scale jobs - boiler reinsulation, exhaust flue duct, etc.

Seaford

- Many jobs over the last several years.

Martinsville

- General insulation work. Insulation installation, fabrication and modification of piping, valves, ducts, and equipment.

Kinston

- Waste disposal. Transports dumpster to plant landfill and empties.

Old Hickory

- Removal and waste disposal.

DUP 1010983

Question 2. (Continued)

Camden

- Demolition of auxiliary power house.
- Spinning machine overhaul.
- Boiler overhaul.
- Stripping insulation from dismantled process piping.

DUP 1010984

DU 053026

Question 3. List the contractors and indicate your assessment of the contractor's performance.

Cape Fear

- Daniels Construction - Good
- Central Salvage - Borderline, required excessive followup.

Waynesboro

- Manchester - Poor
- Brown and Root - Good now
- WNI Industrial Service - Borderline

Cooper River

- Daniels Construction - Good

Chattanooga

- BFI
- Waste Disposal, Incorporated.

Richmond

- Ford Brothers Insulation Company - Satisfactory

Seaford

- County Insulation - Very good
- Tri State - Good
- Major Construction - Fair

Martinsville

- BWB - Satisfactory
- Star-Davis - Good
- Metro - Satisfactory

Kinston

- Carter-Hill Sanitation - Good

DUP 1010985

Question 3. (Continued)

Old Hickory

- Levy, Nashville, Tn. - Good

Camden

- Daniels Construction - Very good
- Boiler Tube Company of America - Good
- Camden Steel & Metal Company - Satisfactory, required close followup.

DUP 1010986

DU 053028

Question 4. How is liaison handled between the site and the contractor?

Cape Fear

Contractor coordinates from the area with contractor management.

Waynesboro

Engineering contract coordinator.

Cooper River

Engineering and Environmental Control Groups

Chattanooga

Contract coordinator

Richmond

Through Construction

Seaford

Contract administrator

Martinsville

Du Pont has liaison assigned to coordinate contractor work on site.

Kinston

Site contacts contractor via phone when needed.

Old Hickory

Contract coordinator (Du Pont Area Contract Administrator).

Camden

~~Contract~~ coordinator handles all communications with supervisor of contractor personnel.

DUP 1010987

DU 053029

Question 5. What role did the site play in dealings **between the contractor and governmental agencies?**

Cape Fear

Prepared notification correspondence and coordinated site visits by government as required.

Waynesboro

None.

Cooper River

Notification and disposal.

Chattanooga

None.

Richmond

None.

Seaford

Contact between Delaware Valley Purchasing, Contract Administrator, and contractor relative to OSHA requirements.

Martinsville

None. Plant insists that contractor meets all Federal and State requirements.

Kinston

Site handled all contacts.

Old Hickory

Followup on necessary contacts.

Camden

Handled correspondence relative to demolition, removal, renovation.

Arranged visits to site upon request of government representatives.

DUP 1010988

Question 6. What information did the site give the contractor with respect to the health hazards of asbestos, governmental requirements for personnel protection, monitoring, waste disposal, etc.?

Cape Fear

Regulations, Du Pont Engineering Standard S4T, had contractor sign document that asbestos handlers were in medical surveillance program.

Waynesboro

OSHA and EPA standards.

Cooper River

Following notification. Complete packet. Trained their supervision on barricades, ventilation, disposal, labels, wetting, and respirators. Performed monitoring.

Chattanooga

Documented discussion with contractor and his responsibility to comply with Reg. 40 CFR 61.

Richmond

Told about the asbestos standard and that's about it.

Seaford

Complete review of Seaford Administrative Work Procedure.

Martinsville

Insists that contractor follow all plant procedures and OSHA guidelines.

Kinston

Site covered contractor.
Regional Purchasing covers the requirements.

Old Hickory

Includes a statement in the scope of work, what the material is and that he must follow the law.

Camden

Provided contractor with copy of OSHA and EPA standards for asbestos; contract coordinator reviewed requirements.

DUP 1010989

Question 7. Did the site furnish the contractor with any equipment, either loaned or permanently, to use with the asbestos job? **If so, list the equipment.**

Cape Fear

Nothing furnished.

Waynesboro

Nothing furnished.

Cooper River

Half-mask respirators.

Chattanooga

Nothing furnished.

Richmond

Nothing furnished.

Seaford

Nothing furnished.

Martinsville

Nothing furnished.

Kinston

Nothing furnished.

Old Hickory

Normally, ~~nothing~~ **nothing** furnished. On one job, we supplied bags and tags for the asbestos waste.

Camden

Gave Camden Steel and Metal enough disposable respirators for his employees involved with the job. **Nothing** furnished other contractors.

DUP 1010990

DU 053032

Question 8. ~~How~~ was comanagement avoided?

Cape Fear

With understanding between Plant, Construction, and Contractor management prior to starting the job; interface with contractor management was through specific individuals.

Waynesboro

Contacts with contractor supervision only.

Cooper River

Plant support requested by Daniels. Worked with their supervision.

Chattanooga

Richmond

All dealings, comments, audit results were given to the contractor liaison.

Seaford

Has not been a problem.

Martinsville

Plant provides guidelines, but contractor manages his people.

Kinston

Contractor was made aware of the hazards. Management left up to contractor.

Old Hickory

Told them what to do, not how to do it.

Camden

Told contractor, or gave it in writing if contractor requested, that if we were doing this job this is how we would do it. Emphasized, however, and made sure contractor understood that how he did the job was his decision. All contacts handled between site contract coordinator and contractor supervisor.

DUP 1010991

DU 053033

Question 9. If the site audited the job while the contractor was performing it, list the segments of the job audited, how the auditing was done, and the frequency of auditing.

Cape Fear

Work practices were audited 2-3X per day by Environmental Group, continuously by Plant and Construction management. Air samples were taken randomly outside contractor barricade to insure Du Pont employees' safety.

Waynesboro

Air monitored outside barricaded areas.

Cooper River

On Day Shift by Environmental Control and Process Control (they did monitoring).

Chattanooga

Annual audit of pickup, transportation, and disposal.

Richmond

Not formally.

Seaford

Barricades, signs, removal methods, dust contamination, sampling, bagging, disposal, etc. Frequency of audits was daily.

Martinsville

- Barricades
- Wetting down
- Protection to operating personnel
- Waste disposal
- Personal protective equipment

Audits done daily.

Kinston

Audited dumping of insulation in a hole. Annually.

Old Hickory

Daily on all phases.

DUP 1010992

Question 9. (Continued)

Camden

Work practices audited almost continuously by contract coordinator; several times/day by SHEA, Engineering and Manufacturing (if work done in operating area). Auditing done by visual inspection. All aspects of the government requirements for handling asbestos were audited. Air samples for asbestos concentration taken outside barricade by Engineering.

DUP 1010993

DU 053035

Question 10. List and explain briefly other items pertinent to outside contractor involvement with asbestos.

Cape Fear

Hopefully from this survey, we can develop a list of the "best" asbestos handling contractors.

Waynesboro

Biggest problem is cleanup of an area after contractor is done.

Cooper River

Chattanooga

Richmond

Seaford

- 6 mil plastic bags are furnished by Du Pont.
- Disposal (off-site) by "Eastern Disposal". Arrangements through SHEA.
- ~~Dust masks~~ are being worn by contractors for removal of ~~sheet rock~~.

Martinsville

Generally, Contractors have been used at Martinsville to do non-asbestos work. There have been no contractors used to do strictly demolition type work. Plant forces have generally stripped asbestos insulation outside on pipes, valves, ducts and equipment that contractors have removed or modified prior to disposal.

Kinston

Contractors used to remove insulation should take adequate safeguards to prevent exposure of Plant personnel.

DUP 1010994

Question 10. (Continued)

Old Hickory

You have covered the waterfront.

Camden

Cheapest isn't always least expensive. A contractor we had for one job was totally unfamiliar with the hazards of asbestos and the myriad of government regulations and red tape involved with handling asbestos. His idea was to knock it down and haul it away. Plant personnel spent a great deal of time "Holding his hand" so that in the end, although he was low bidder, the job cost more than it would have if we had gotten a qualified contractor originally. A contract should not be approved unless all areas involved are sure the contractor can do the work on his own.

DUP 1010995

DU 053037

SUMMARY

- All sites have used outside contractors in asbestos work.
- Extent of contractor involvement ranges from transporting waste asbestos to landfill to demolition of a major facility.
- Assessment of contractor performance from poor to very good.
- Liaison with contractor varies widely.
 - Call on phone when needed.
 - Contract coordinator responsible for all dealings with contractor.
- Six (6) sites handled required notification of governmental agencies.
- Information imparted by site to contractor re hazards of asbestos and regulations ranges from simply telling contractor to comply with regulations to in-depth review of regulations and hazards.
- Two (2) sites have furnished respirators for contractor personnel; one other has supplied bags and tags for waste.
- All sites avoid comanagement by letting contractor do the job without specifying how he does it; communications with contractor supervisor only.
- Auditing ranges from practically none to continuous.
- Need to develop a list of best qualified contractors.

DUP 1010996

DU 053038