

NOTE TO FILE

SUBJECT: Engineering project to repair and/or replace and cover exposed asbestos insulation on pipes and vessels in DPMC-North.

DATE: 4-3-80

Following a consultant's review of the complex, Inspection defined a project to repair and/or replace and cover up exposed asbestos insulation on pipes and vessels in DPMC-North. The repairs are extensive and Inspection is planning for a 3-year completion period. D.E. Johnson is organizing the planned work on a prioritized scheduled and is making an AFE estimate.

The purpose of the project is to remove potential sources of asbestos exposure from the operating areas. Much of the exposed insulation is old and deteriorating. As a result, any disturbance of the insulation can liberate asbestos particles into the air. The insulation gradually dislodges from the pipes and structures and falls to the ground or various work surfaces. This constitutes a housekeeping problem as well as another source of potential exposure. OSHA standard 1910.1001 (h)(i) requires

"All external surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers if, with their dispersion, there would be an excessive concentration."

In addition, because of the low level (0.1 fibers/ml. of air) at which OSHA requires medical exams, particular care must be taken in controlling work areas.

Anacortes Refinery submitted an AFE for a similar project several years ago. Initially the project was rejected for inadequate justification. Anacortes did succeed in gaining approval when the justification addressed:

- (1) reduction of employee exposure and chance of OSHA citation
- (2) savings in operating efficiency (energy savings)
- (3) savings in maintenance costs (making repairs on a planned basis rather than delaying work and paying higher costs)

Work started over a year ago at Anacortes and is about 60% complete. They are using a contract maintenance crew of about

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10 with a Shell foreman. They are making repairs one unit at a time. They are required to complete all repairs in a unit before moving on to the next unit.



J.D. Ransdell

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