

Interoffice Memorandum

PLAINTIFF'S EXHIBIT

CEL-1045

GEN 55 (REV.6/74)

TO (Name and Location)

Dr. C. E. Loeffler - Mr. B. C. Stephens

DATE

January 3, 1980

FROM (Name and Location)

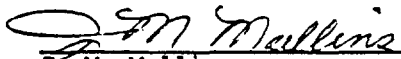
J. M. Mullins; L. G. Ogden

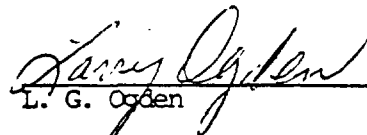
REFERENCE NO.

JMM-853-80;LGO

Asbestos Handling Procedures

The attached asbestos handling procedures have been reviewed and approved by plant personnel. We recommend that the procedures be approved by the Pampa Plant Managers and included in the plant's administrative procedures.


J. M. Mullins


L. G. Ogden

/mh

Attachments

cc: C. E. Steel
A. A. Miller
H. N. O'Neal
M. A. John

File: E-10-A-4

010657

CELANESE CHEMICAL COMPANY, INC.
Pampa Plant

Asbestos Handling Procedures

Part A

Purpose

- To establish a procedure for handling materials made of, or containing asbestos.
- To comply with OSHA Asbestos Standards 1910,1001.
- To comply with EPA Standards for the removal and reporting requirements contained in the October 14, 1975 Federal Register as amended March 2, 1977 and June 19, 1978.

OSHA Asbestos Standards

Permissible exposure to airborne concentrations of asbestos fibers. Standards effective July 1, 1976. The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employ may be exposed shall not exceed two (2) fibers, longer than five (5) micrometers per cubic centimeter of air.

Ceiling Concentration - No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 (10) fibers, longer than five (5) micrometers per cubic centimeter of air.

EPA Requirements

Any owner or operator of a demolition or renovation operation who intends to demolish any institutional, commercial, or industrial buildings, structure, facility, installation, or portion thereof which contains any pipe, duct, boiler, tank reactor, turbine, furnace, or structural member that is insulated or fire-proofed with friable asbestos material will be covered by the following procedures Part A.

Demolition and Renovation

Reference the attached Celanese Chemical Company, Inc., Environmental Policy reporting requirements.

Demolition

Means the wrecking or taking out of any load supporting structure member and any related removing or stripping of friable-asbestos materials.

Renovation

Means the removal or stripping of friable-asbestos material used on any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member. Operations in which load supporting structure members are wrecked or taken out are excluded.

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Friable Asbestos

Means any material that contains more than one (1) percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand.

Policy

All employees involved with removal, clean-up, and/or disposal of asbestos containing insulation (ACI) will be informed of the health hazards associated with the handling of these materials.

All unidentified insulation will be handles as an ACI. All non-ACI will be color coded or identified.

Reference the Federal Register/Vol. 44 No. 136/Friday, July 13, 1979, wherein EPA proposes:

There is no doubt that asbestos is a human carcinogen and no safe or threshold level of exposure to asbestos has been established. EPA believes that any exposure increases a persons risk of developing lung cancer, mesothelioma, asbestosis or other diseases.

Procedures

The Environmental Coordinator will be notified of proposed/planned work scheduled to remove ACI in amounts equal to, or greater than that described in the introductory paragraph, Purpose.

The work area will be roped off during the removal of ACI and warning signs posted to restrict entrance into the area.

The supervisor, Celanese or contract, who is responsible for the craftsperson will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other supervision in the plant, Celanese and/or contract, to insure that asbestos is not handled by any other employee.

The Safety Department and the plant Industrial Hygienist will be notified when asbestos handling work is scheduled. They will be responsible for obtaining the required samples and the sampling results.

Protective Clothing

The use of disposable coveralls is required. They will be removed following completion of the job and placed in a plastic burial bag labeled with an approved caution tag.

Either single use type or any other approved respirator is required. The single type respirator will be disposed of as described above.

Rubber boots and gloves are required; they will be thoroughly washed after each use.

Slicker suits may be worn in place of the disposable coveralls during cold weather. They will be thoroughly washed after each use.

010659

Only clean or new protective clothing will be stored in lockers used for street clothing.

CAUTION: At no time is compressed air to be used for dusting off skin or clothing.

Drilling or Sawing Transite

1. The immediate work area must be marked off with approved caution signs to prevent unauthorized personnel from entering the area.
2. A tank type vacuum pump with disposable bags will be provided with hoses connected to electric saws or drills to prevent airborne asbestos dust. The disposable bag will be periodically inspected and replaced if damaged.
3. A plastic sheet should be attached to the back side of the transite to form a dust collection bag.
4. The disposable bag (Part A.3) and the plastic sheet (Part A.4) will be disposed of in plastic bags in approved landfill sites.

Insulation Removal

1. Unless marked, all insulation removed will be treated as prescribed in asbestos handling procedures.
2. The immediate work area will be marked off with approved caution signs to prevent unauthorized personnel from entering the area.
3. All asbestos containing materials will be adequately wetted during (prior to) removal.
4. All asbestos containing materials will be removed from pipes, ducts, etc., prior to dismantling any structure.
5. After removal, all asbestos containing waste materials shall be sealed into leak-tight containers while wet and deposited in an approved landfill site.
6. Asbestos containing waste materials shall not be dropped or thrown to the ground but shall be carefully lowered to the ground. Asbestos that has been removed more than 50 feet above ground level, except asbestos removed as units or in sections, shall be transported to the ground via dust-tight chutes or containers.
7. When asbestos containing materials are not wetted due to freezing temperatures (32°F or less), such as materials on pipes, ducts, boilers, tanks, reactors, turbines, furnaces or structural members shall, to the maximum extent possible, be removed as units or in sections prior to wrecking.
8. The immediate work area will be immediately cleaned and washed down.
9. All sealed, tagged bags will be buried in an approved landfill site. The sealed, tagged plastic bags will be handled, transported and deposited in the landfill site in a cautious manner to insure that the bag is not torn or destroyed.

Training

All personnel involved with the removal, clean-up, and disposal of asbestos containing materials shall be informed of the health hazards associated with handling asbestos.

Medical Examinations

The number of employees exposed to asbestos will be kept at a minimum. Each employee who handles asbestos will be required to have a pre-employment medical examination, an annual medical examination, and a termination medical examination. Records will be retained by the plant for 20 years.

010660

Part B

Purpose

To establish plant procedures for handling ACI and/or materials in quantities less than those regulated by EPA.

Policy

As defined in Part B.

Procedures

The supervisor, Celanese or contract, who is responsible for the craftsperson will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other line supervision in the plant, Celanese and/or contract, to insure that asbestos is not handles by any other employees.

Protective Clothing

The use of disposable coveralls is not required when the amount of insulation to be removed is some three (3) feet or less. They are, however, required when more than three (3) feet of ACI is removed.

Single use type respirators are required.

Drilling and Sawing Transvite

A tank type vacuum pump with a disposal bag will be provided with hoses connected to electric saws or drills to prevent airborne dust. The disposable bag will be periodically inspected and replaced if damaged.

The work area will be immediately cleaned and water washed. The disposable bag and/or accumulated dust will be transferred to a plastic bag and disposed of in an approved landfill site.

Insulation Removal

Unless marked, all insulation removed will be handles as ACI. Insofar as practical, all ACI will be adequately wetted during (prior to) removal.

All ACI will be removed from pipe, ducts, etc., prior to dismantling any structure.

After removal, all ACI will be sealed into leaktight plastic containers while wet and deposited in an approved landfill site. ACI and/or waste materials shall not be dropped or thrown to the ground, but shall be carefully lowered to the ground.

Upon completion of an assigned job, the craftsperson will immediately clean (wet sweeping) and wash down the work area.

All sealed/tagged plastic bags will be buried in an approved landfill site.

Training

All personnel involved, (as in Part A).

Medical Examinations

(As in Part A.)

010662

Celanese Chemical Company, Inc.⁽¹⁰⁾
Environmental Policy

C. EPA Notification Requirements for Asbestos Removal (Reference: Federal Register 40 CFR Parts 61.20-61.25)

- a. Each coordinator should be familiar with the provisions of these regulations. Read and advise operations.

These EPA regulations are to control asbestos air emissions under the National Emission Standards for Hazardous Air Pollutants (NESHAPS). The regulations recognize a distinction between demolition and renovation. EPA's definitions of demolition and renovation are appended to Guideline 7. The reporting requirements are different. We must always notify in advance with respect to demolition without regard to quantity. We only notify in advance with respect to renovation when we are in excess of the quantities involved.

b. Renovation Operation:

Notification requirement applies for plant maintenance where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed. With respect to adding up the asbestos stripped or removed in several operations, Part 61.22(d)(3) provides that a planned renovating operation is additive over the maximum period of time for which a prediction can be made, up to one year. Written notice is required once for a planned renovation operation where the additive total exceeds the minimum amounts within one year. Written notice is required once for a planned renovation operation where the additive total exceeds the minimum amounts within one year. Written notice shall be provided to the TACB Executive Director⁵ "as early as possible" prior to commencement of renovation. Such notice shall include the following information: 010663

- | | |
|---------------------|---|
| (1) owner | (5) starting and completion dates |
| (2) address | (6) nature of job |
| (3) description | (7) procedure |
| (4) address of site | (8) approved landfill site
(See Section 61.25) |

c. Demolition operation:

Remember, for demolition, we always have to notify, even if below the minimum quantities. Where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed, written notice shall be provided to the TACB Administrator⁵ at least ten days prior to commencement of the demolition. Such notice shall include the eight items listed above for renovation plus item nine: name, title, and authority of the state or local governmental representative who has ordered a demolition which is subject to Part 61.22(d)(6).

When the demolition involves friable asbestos below 260 feet of pipe or 160 square feet, written notice shall be provided to the TACB Administrator⁵ at least twenty days prior to commencement of demolition. Such notice shall include the following information:

- | | |
|---------------------|---|
| (1) owner | (4) starting and completion dates |
| (2) address | (5) State the measured or estimated
amount of friable asbestos material
which is present. |
| (3) address of site | |

010664

EN	GENERAL INFORMATION	
TI	Plant and Location	DATE
PI	Dr. C. E. Loeffler, - Mr. B. C. Stephens	January 3, 1980
	J. M. Mullins; L. G. Ogden	REFERENCE NO. JMN-853-80;LGO

Asbestos Handling Procedures

The attached asbestos handling procedures have been reviewed and approved by plant personnel. We recommend that the procedures be approved by the Pampa Plant Managers and included in the plant's administrative procedures.

J. M. Mullins
J. M. Mullins

L. G. Ogden
L. G. Ogden

/sh

Attachments

cc: C. E. Steel
A. A. Miller
H. M. O'Neal
M. A. John

010665

File: B-10-A-4

CELANESE CHEMICAL COMPANY, INC.
Pampa Plant

Asbestos Handling Procedures

Part A

Purpose

- To establish a procedure for handling materials made of, or containing asbestos.
- To comply with OSHA Asbestos Standards 1910.1001.
- To comply with EPA Standards for the removal and reporting requirements contained in the October 14, 1975 Federal Register as amended March 2, 1977 and June 19, 1978.

OSHA Asbestos Standards

Permissible exposure to airborne concentrations of asbestos fibers. Standards effective July 1, 1976. The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed two (2) fibers, longer than five (5) micrometers per cubic centimeter of air.

Ceiling Concentration - No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 (10) fibers, longer than five (5) micrometers per cubic centimeter of air.

EPA Requirements

Any owner or operator of a demolition or renovation operation who intends to demolish any institutional, commercial, or industrial buildings, structure, facility, installation, or portion thereof which contains any pipe, duct, boiler, tank reactor, turbine, furnace, or structural member that is insulated or fire-proofed with friable asbestos material will be covered by the following procedures Part A.

Demolition and Renovation

Reference the attached Celanese Chemical Company, Inc., Environmental Policy reporting requirements.

Demolition

Means the wrecking or taking out of any load supporting structure member and any related removing or stripping of friable-asbestos materials.

Renovation

Means the removal or stripping of friable-asbestos material used on any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member. Operations in which load supporting structure members are wrecked or taken out are excluded.

010666

Friable Asbestos

Means any material that contains more than one (1) percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand.

Policy

All employees involved with removal, clean-up, and/or disposal of asbestos containing insulation (ACI) will be informed of the health hazards associated with the handling of these materials.

All unidentified insulation will be handled as an ACI. All non-ACI will be color coded or identified.

Reference: the Federal Register/Vol. 44 No. 136/Friday, July 13, 1979, wherein EPA proposes:

There is no doubt that asbestos is a human carcinogen and no safe or threshold level of exposure to asbestos has been established. EPA believes that any exposure increases a person's risk of developing lung cancer, mesothelioma, asbestosis or other diseases.

Procedures

The Environmental Coordinator will be notified of proposed/planned work scheduled to remove ACI in amounts equal to, or greater than that described in the introductory paragraph, Purpose.

The work area will be roped off during the removal of ACI and warning signs posted to restrict entrance into the area.

The supervisor, Celanese or contract, who is responsible for the craftsman will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other supervision in the plant, Celanese and/or contract, to insure that asbestos is not handled by any other employee.

The Safety Department and the plant Industrial Hygienist will be notified when asbestos handling work is scheduled. They will be responsible for obtaining the required samples and the sampling results.

Protective Clothing

The use of disposable coveralls is required. They will be removed following completion of the job and placed in a plastic burial bag labeled with an approved caution tag.

Either single use type or any other approved respirator is required. The single type respirator will be disposed of as described above.

⌈ Rubber boots and gloves are required; they will be thoroughly washed after each use.

Slicker suits may be worn in place of the disposable coveralls during cold weather. They will be thoroughly washed after each use.

010667

- Only clean or new protective clothing will be stored in lockers used for street clothing.

CAUTION: At no time is compressed air to be used for dusting off skin or clothing.

Drilling or Sawing Transite

1. The immediate work area must be marked off with approved caution signs to prevent unauthorized personnel from entering the area.
2. A tank type vacuum pump with disposable bags will be provided with hoses connected to electric saws or drills to prevent airborne asbestos dust. The disposable bag will be periodically inspected and replaced if damaged.
3. A plastic sheet should be attached to the back side of the transite to form a dust collection bag.
4. The disposable bag (Part A.3) and the plastic sheet (Part A.4) will be disposed of in plastic bags in approved landfill sites.

Insulation Removal

1. Unless marked, all insulation removed will be treated as prescribed in asbestos handling procedures.
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6. Asbestos containing waste materials shall not be dropped or thrown to the ground but shall be carefully lowered to the ground. Asbestos that has been removed more than 50 feet above ground level, except asbestos removed as units or in sections, shall be transported to the ground via dust-tight chutes or containers.
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Training

All personnel involved with the removal, clean-up, and disposal of asbestos containing materials shall be informed of the health hazardous associated with handling asbestos.

Medical Examinations

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010668

Part B

Purpose

To establish plant procedures for handling ACI and/or materials in quantities less than those regulated by EPA.

Policy

As defined in Part B.

Procedures

The supervisor, Celanese or contract, who is responsible for the craftsperson will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other line supervision in the plant, Celanese and/or contract, to insure that asbestos is not handled by any other employees.

Protective Clothing

The use of disposable coveralls is not required when the amount of insulation to be removed is some three (3) feet or less. They are, however, required when more than three (3) feet of ACI is removed.

Single use type respirators are required.

Drilling and Sawing Transvite

A tank type vacuum pump with a disposal bag will be provided with hoses connected to electric saws or drills to prevent airborne dust. The disposable bag will be periodically inspected and replaced if damaged.

The work area will be immediately cleaned and water washed. The disposable bag and/or accumulated dust will be transferred to a plastic bag and disposed of in an approved landfill site.

Insulation Removal

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All ACI will be removed from pipe, ducts, etc., prior to dismantling any structure.

After removal, all ACI will be sealed into leaktight plastic containers while wet and deposited in an approved landfill site. ACI and/or waste materials shall not be dropped or thrown to the ground, but shall be carefully lowered to the ground.

Upon completion of an assigned job, the craftsperson will immediately clean (wet sweeping) and wash down the work area.

All sealed/tagged plastic bags will be buried in an approved landfill site.

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Training

All personnel involved. (as in Part A).

Medical Examinations

(As in Part A.)

010670

Olanese Chemical Company, Inc.
Environmental Policy

C. EPA Notification Requirements for Asbestos Removal (Reference:
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- a. Each coordinator should be familiar with the provisions
of these regulations. Read and advise operations.

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- | | |
|---------------------|---|
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| (3) description | (7) procedure |
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(See Section 61.25) |

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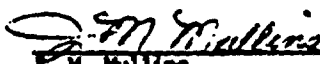
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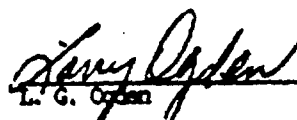
Interoffice Memorandum

TO (Name and Location) Dr. C. E. Loeffler - Mr. B. C. Stephens	DATE January 3, 1980
FROM (Name and Location) J. M. Mullins; L. G. Ogden	REFERENCE NO. JMS-853-80;LGO

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cc: C. E. Steel
A. A. Miller
E. H. O'Neal
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File: E-10-A-4

010673

CELANESE CHEMICAL COMPANY, INC.
Pampa Plant

Asbestos Handling Procedures

Part A

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010674

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The Safety Department and the plant Industrial Hygienist will be notified when asbestos handling work is scheduled. They will be responsible for obtaining the required samples and the sampling results.

Protective Clothing

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Rubber boots and gloves are required; they will be thoroughly washed after each use.

Slicker suits may be worn in place of the disposable coveralls during cold weather. They will be thoroughly washed after each use.

010675

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Training

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Medical Examinations

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010676

Part B

Purpose

To establish plant procedures for handling ACI and/or materials in quantities less than those regulated by EPA.

Policy

As defined in Part B.

Procedures

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The work area will be immediately cleaned and water washed. The disposable bag and/or accumulated dust will be transferred to a plastic bag and disposed of in an approved landfill site.

Insulation Removal

Unless marked, all insulation removed will be handled as ACI. Insofar as practical, all ACI will be adequately wetted during (prior to) removal.

All ACI will be removed from pipe, ducts, etc., prior to dismantling any structure.

After removal, all ACI will be sealed into leaktight plastic containers while wet and deposited in an approved landfill site. ACI and/or waste materials shall not be dropped or thrown to the ground, but shall be carefully lowered to the ground.

Upon completion of an assigned job, the craftsperson will immediately clean (wet sweeping) and wash down the work area.

All sealed/tagged plastic bags will be buried in an approved landfill site.

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Training

All personnel involved. (as in Part A).

Medical Examinations

(As in Part A.)

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Environmental Policy

C. EPA Notification Requirements for Asbestos Removal (Reference:
Federal Register 40 CFR Parts 61.20-61.25)

- a. Each coordinator should be familiar with the provisions
of these regulations. Read and advise operations.

These EPA regulations are to control asbestos air emissions
under the National Emission Standards for Hazardous Air
Pollutants (NESHAPS). The regulations recognize a distinction
between demolition and renovation. EPA's definitions of
demolition and renovation are appended to Guideline 7. The
reporting requirements are different. We must always notify
in advance with respect to demolition without regard to
quantity. We only notify in advance with respect to renovation
when we are in excess of the quantities involved.

b. Renovation Operation:

Notification requirement applies for plant maintenance where
more than 260 feet of pipe insulated or fireproofed with friable
asbestos material are stripped or removed, or more than 160 square
feet of friable asbestos material are stripped or removed. With
respect to adding up the asbestos stripped or removed in several
operations, Part 61.22(d)(3) provides that a planned renovating
operation is additive over the maximum period of time for which
a prediction can be made, up to one year. Written notice is
required once for a planned renovation operation where the
additive total exceeds the minimum amounts within one year.
Written notice is required once for a planned renovation operation
where the additive total exceeds the minimum amounts within one
year. Written notice shall be provided to the TACB Executive
Director⁵ "as early as possible" prior to commencement of renovation.
Such notice shall include the following information

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- | | |
|---------------------|---|
| (1) owner | (5) starting and completion dates |
| (2) address | (6) nature of job |
| (3) description | (7) procedure |
| (4) address of site | (8) approved landfill site
(See Section 61.25) |

c. Demolition operation:

Remember, for demolition, we always have to notify, even if below the minimum quantities. Where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed, written notice shall be provided to the TACB Administrator⁵ at least ten days prior to commencement of the demolition. Such notice shall include the eight items listed above for renovation plus item nine: name, title, and authority of the state or local governmental representative who has ordered a demolition which is subject to Part 61.22(d)(6).

When the demolition involves friable asbestos below 260 feet of pipe or 160 square feet, written notice shall be provided to the TACB Administrator⁵ at least twenty days prior to commencement of demolition. Such notice shall include the following information:

- | | |
|---------------------|---|
| (1) owner | (4) starting and completion dates |
| (2) address | (5) State the measured or estimated
amount of friable asbestos material
which is present. |
| (3) address of site | |

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