

ASARCO

El Paso Plant

PLAINTIFF'S EXHIBIT

ASA-1389

FROM: Peggy Munsell, Safety & Health Director
ASARCO
PO Box 1111
El Paso, TX 79912
(915) 521-3640

To: Manny Acuna
Sun City Analytical
Fax (915) 533-8843

Subject: Asbestos Abatement Plan, dated August 26, 1996.
Date: 09/13/96

Manny, as per our conversation this date, I need some issues addressed in our Abatement Plan. You stated some of the information were blanket statements used in the Abatement Plan. Section 01043, item 1.02 uses certification language whereas section 01300, item 1.01 uses license language for abatement workers. You indicated that section 02088 was specific for our operation. Please clarify in the Abatement Plan (I believe would be addressed in section 02088) the following;

- Classification type of material being removed.
- Requirements for workers, certified, licensed, or neither based on the type of material being removed in an industrial setting.
- Section 02088, item H assumes that a contractor will be used. Certified plant personnel, abatement workers and supervisor(s), may be used for the project or we may contract this work out. It also makes reference to an IH used pre and post abatement. Should we perform this work in house, would my professional degree, Master's in Industrial Hygiene qualify me to perform this function.
- Item I also makes reference to an IH, please clarify requirements.
- Please also indicate in the Abatement Plan requirement for personnel air monitoring.
- One item that I was not able to locate in the plan was the work practice in removing gaskets located between a few of the sections of the duct work. Please include this in our Abatement Plan.

I will be out of my office from September 16-20. Should you have questions, please contact Greg Parham at 541-1829. We would like to receive the up-date no later than September 20, so we can proceed with the work.

Thank you for your help.

CC: G. Parham
A. Ortega

ASARCO ELP 0010685

SECTION 02088 REMOVAL OF ASBESTOS DUCT WRAP

Procedures

- A. Lock out all electrical power where actual asbestos removal will occur.
- B. Asbestos removal of asbestos containing roofing material shall be performed using all personal protective equipment to include half face respirator with HEPA filter cartridges. Contractor shall erect decontamination station as specified in its respective section on all areas of abatement.

Removal of ACM duct wrap

- A. Set up barrier tape, warning signs, and control center.
- B. Preclean all surfaces, using the clean up procedures indicated in its section. Pick up and bag up any debris, spray encapsulant on all ACM.
- C. Prior to set up poly, welders shall cut all steel reinforcement plates to gain access to ACM. ASARCO safety procedures for hot work shall be implemented.
- D. When welders have completed all the cutting of the metal, the supervisor shall inspect the areas to insure no hot metal or fire hazards exist in the work area prior to erection of wind breaker.
- E. Workers shall install wind breaker. This wind breaker will consist of six feet high walls around the work area, those walls shall be made of two layers of 6 mil (black) poly. Wind breaker shall be connected to a decontamination unit.
- F. Set up decontamination unit according with the procedures before mentioned in its section.
- G. Minimum respirator shall be half mask with hepa cartridges. Asbestos workers shall use gloves, rubber boots and tyvek suits (or equivalent).
- H. Removal of ACM shall be accomplished using a two man team. One man shall spray amended water with equipment capable of a "mist", and the other shall pry up tile with hand tools. No sand grinding or drill machine shall be used to remove the material.

- G. All ACM material and debris shall be double bagged and disposal procedures in Section 01716 of this manual shall be followed.
- H. Section of Cleaning and Decontamination Procedures shall be followed when directed by IH. Contractor shall contact IH for visual inspection prior to begin Cleaning and Decontamination.
- I. Clearance testing shall be performed by the IH (owners representative). The results of the IH (owners representative) shall be the final word on clearance levels.
- I. Upon acceptable clearance levels, re-establish work areas and systems back to normal operations. Repair/ Restore any and all damaged areas back to original condition.

END OF SECTION