



DOW CHEMICAL U.S.A.

TEXAS DIVISION
FREEPORT, TEXAS 77541
A. P. Beutel Bldg.

November 19, 1984

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Engineering Group
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xc: Carl Burleson

ASBESTOS

The requirements for handling asbestos has been discussed at our last two staff meetings. In spite of this, I think there may be some confusion as to what the requirements are. Please read the following which is from our departmental description of the Clean Air Act. Be sure that your people who may handle asbestos are informed of these requirements and understand them:

I. Asbestos

In 1984, the EPA published a final rule amending the National Emission Standard for Asbestos. This rule revised the requirements for notification to the Texas Air Control Board prior to demolition or renovation involving asbestos. The revised notification requirements are as follows:

Demolition: Written notification to the TACB must be post-marked 20 days prior to starting any demolition project involving the stripping or removal of friable asbestos. All demolition projects must be reported.

Planned Renovation: To determine whether notification for planned renovations is required, one must predict the amount of friable asbestos, either as separate projects or coupled with other associated facility renovations, to be removed from a facility during a calendar year. Asbestos removal resulting from small jobs such as repair of leaking valves, leaking pipelines, or other equipment maintenance should be included in the estimate. If the additive amount exceeds 260 linear feet or 160 square feet, the TACB must be notified in writing as early as possible before the start of a project. The TACB has informally requested a minimum of 10 days prior notification.

AN OPERATING UNIT OF THE DOW CHEMICAL COMPANY

PLAINTIFF'S EXHIBIT

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Environmental Services will continue to make the required notifications. It is the responsibility of the block superintendent or his representative to contact Environmental Services so the proper notification can be made. Insulators are not responsible for the notification.

Refer to Safety Standard No. 45 for asbestos handling requirements.

When we do projects involving asbestos, we should expect an on-site inspection by the Texas Air Control Board, either during or after completion of the job. They will be checking to see if we are following all the proper asbestos handling procedures as described in Safety Standard 45 and in the booklet "Handbook for Handling Asbestos Material".



John Ogle

pm

attachment - definitions

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DEFINITIONS

Friable Asbestos - Any material containing more than one percent asbestos by weight that hand pressure can crumble, pulverize, or reduce to powder when dry.

Demolition - The wrecking or taking out of any load-supporting structural member of a facility.

Renovation - Altering in any way one or more facility components.

Planned Renovation - Renovation operation in which the amount of friable asbestos material that will be removed or stripped within a given period of time can be predicted. Individual non-scheduled operations are included if a number of such operations can be predicted (i.e. leaking valves).

Facility - Any institutional, commercial, or industrial structure, installation, or building. An individual process or production block can be considered a facility.

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SECTION IV

SAFE WORK PROCEDURE

SUBJECT: REMOVAL OF NON-FRIABLE ASBESTOS MATERIALS (TRANSITE, HAVEG PIPING, ETC.)

Minimum Safety Equipment requirements:

1. Hard hat must be worn.
2. Sideshield glasses must be worn.
3. Approved dust respirator must be worn during materials removal and also during cleanup.
4. If sawing or drilling is required as part of the job then an Asbestos Safety Checklist (page 13) must be filled out prior to the job. The safe work procedure for sawing and drilling of materials containing asbestos must be followed.
5. All other safety equipment which is required by job location must be used. (Read Area Safe Work Permit.)

Special Precautions:

1. In some instances, the use of water to wet the material to prevent airborne emissions may be required.
2. Materials should not be handled in a manner that will create dust.
3. Upon removal, provisions must be made with Environmental Operations for disposal.
4. After remove, a thorough inspection and cleanup must be made to remove all asbestos material. Examples of areas to be cleaned are pipe/vessels, scaffold boards, piperacks, surrounding area at grade, etc.

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