ARCO COMPANY CORRESPONDENCE

-98 (Rev. 1-68)

FROM:	Hector DeLa Garza
TO:	Tony Dunn
COPY:	D. W. Riner, J. B. Barbee, T. King, S. Haynes
DATE & SUBJECT:	November 13, 1987 *INSULATED PIPING DEMOLITION*

Bloomberg No. 6113 PLAINTIFF'S EXHIBIT RMC-20

An insulated (asbestos) steam line cut in small pieces was discovered at the salvage yard. The line apparently came from Facility 33.

This asbestos covered line was cut and handled by plant personnel without any personal respiratory equipment to prevent asbestos particle exposure. No one from Environmental or Building Trades was informed that this asbestos insulated line was going to be taken down.

Our maintenance foremen have got to inform Environmental or Building Trades when this type of work is going to be done so we can inspect and remove any asbestos containing material using proper removal procedures. Attached is Environmental Control Procedure 002 for reference.

Hector DeLa Garza

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Attachment
(Piping Insul Demol/TECH4)

ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

July 1987
Revision 1

Technological Superintendent 9T-1987

Plant Engineer 7/5/87

Operations Superintendent

Maintenance Superintendent

Safety Director

Powerhouse Superintendent

Laboratory Director

Security Director

Assistant Plant Manager

Plant Manager

H. DeLa Garza
(ECP 002 Asbestos/TECH3)

ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

I. SCOPE

II. WORK ORDER

III. RESPONSIBILITY

ENVIRONMENTAL CONTROL PROCEDURE 002
INSULATION REMOVAL
Revision 1

I. SCOPE

Much of the insulation in the plant contains asbestos. Friable asbestos is a hazardous ~~material~~ SUBSTANCE and requires special handling. Disposal of any type asbestos is allowed only to facilities licensed to accept it. No insulation of any type will be disposed of on plant property, nor will it be handled by anyone other than the building trades crew trained and outfitted for removal of asbestos-containing insulation, ~~until environmental and/or building trades supervision has inspected insulation for asbestos~~. The following procedures must be followed when removing insulation, if the insulation is deemed to contain asbestos.

VISUAL INSPECTION TO DETERMINE IF INSULATION CONTAINS ASBESTOS IS NOT POSSIBLE, SAMPLES NEED TO BE ACQUIRED & SENT TO AN ASBESTOS LAB, FOR IDENTIFICATION

II. WORK ORDER

A. The owner of the equipment involved must initiate a work order for insulation removal. He will indicate on the work order an estimate of the surface area involved. This procedure must be followed on jobs where insulation removal is incidental to other work as well as where insulation is the primary objective. Work orders will also indicate whether re-insulation is needed.

B. The work order will be sent to the Environmental/Quality section of the Technological Department (Hector DeLa Garza, Tony Dunn) for proper identification. The Environmental/Quality section will then send the work order to proper Maintenance personnel to be assigned a work order number.

C. The Environmental Group with the help of Maintenance building trades supervisor (Sid Haynes) or foreman (Howard Cave) upon request will take the following action.

1. Check the records to determine if the insulation involved contains asbestos. Primary source will be the survey provided by the RMC Industrial Hygiene Group from Richmond in 1984. If not covered in this survey, the material involved will be tested by the Sherwin Lab and/or outside laboratories.

2. If asbestos is involved, the Environmental Group will make a friability determination for record only. They will verify the quantity involved and notify the appropriate environmental agency as required. At this point, the determination will be made whether to use the plant staging area or to place the insulation directly into the transporter's containers.

3. Notification for removal of insulation containing asbestos will have to be done ten (10) days in advance of removal. This applies to quantities greater than that covering 160 square feet of insulation or 260 linear feet of pipe.

   Notification for small quantities will be done five (5) days in advance of removal.

4. When notification is completed, the work order will be returned to the normal system with a listing of any special requirements over and above normal asbestos handling procedures.

5. A copy of the work order and any associated correspondence will be sent to the Safety Department at this time for review and comment if desired.

D. Upon receipt of the work order from the Environmental Group, a number can be assigned and work can begin.

III. RESPONSIBILITY

A. Plant Forces

The General Foreman having control of the crew removing the insulation is responsible for the following:

1. Providing protective clothing to include dust mask, disposable coveralls, head and foot coverings and gloves.
2. Posting warning signs around the work area.
3. Placing insulation in the proper bags and removing to the staging area.
4. Keeping a daily count of bags removed to the staging area and coordinating with the Environmental Group to insure that the material is removed in a timely manner (90 days maximum holding time).

B. Insulation Removal and Renovation Contractors

The contractor is responsible for the proper handling of the asbestos-containing insulation by his crew. This includes Items 1 through 4 in "A" above.

C. Project Engineer (Plant Insulation Projects)

The project engineer is responsible for overseeing the contractor and assuring that the proper procedures are followed. The project engineer will conduct a contractor asbestos removal/repair audit as the job progresses.