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TO: MIKE VESSELS
STEVE FERAZZI
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SUBJECT: ASBESTOS ABATEMENT

Attached are;

---------Policy Statement, Replacement of Asbestos Materials

---------Summary of Removal and Handling Procedures
of
Asbestos-Containing Cooling Tower Components

---------Exceptions and Clarifications

Please use these for all quotations which necessitate handling of asbestos containing materials for removal and disposal. For major projects; ie, Natural Draft or Concrete Mechanical Draft Towers, there is a more detailed removal and handling procedure!

Gary L. Wilson

DeLoache
DEPOSITION EXHIBIT
NO. 9 9/25/13
SARAH THOMAS
EVANS REPORTING SERVICE

REPLACEMENT OF ASBESTOS MATERIALS

POLICY:

Marley Corporate Policy forbids The Marley Cooling Tower Company from engaging in removal or disposal of cooling tower components containing asbestos unless Marley will reconstruct the cooling tower once the asbestos has been removed. Restrictions apply as to the scope of work to be performed by Marley. Consult the factory for specific guidelines.

INQUIRIES:

In quoting projects requiring asbestos handling, forward all the information available on the client's asbestos handling regulations, local regulations which may affect the work, client's disposal requirements, location of disposal site and information on responsibility for notifying EPA. Complete information is required in order to respond in a timely manner.

MAJOR ASBESTOS CONTAINING COMPONENTS - ALL TOWERS

This list is intended to show components which may have been made of asbestos material and may be installed in some older Marley cooling towers. Actual asbestos containing components for specific towers can be determined by review of applicable records.

Class 800: No Asbestos

Class 700:
- ACB Fill Splashbars
- ACB - Belgian Wave Eliminators
- Asbestos/Neoprene Eliminators
- ACB Stairway Casing and Doors

Class 600 and 500:

- ACB Casing and Louvers (Standard to 1980)
- ACB Fan Deck Overlays
- ACB Fan Deck Side Casings
- ACB Firewall Partitions
- ACB Eliminator Seals and Drainboards
- ACB Hot Water Basin Covers
- ACB Belgian Wave Eliminators
- Asbestos/Neoprene Eliminators
- ACB Fill Splashbars
- ACB Stairway Casing and Doors

Class 400: ACB Fan Deck Overlays

Series 8, 9, 10, 12, 14, and 18 and Underflow:

ACB Casing and Louvers (Standard to 1980)
ACB Fan Deck Overlays
ACB Fill Splashbars
ACB Hot Water Basin Covers
Asbestos/Neoprene Eliminators
Asbestos/Neoprene Fill
ACB Drainboards

Sigma 100 and 120:

ACB Fan Deck Overlays
ACB Hot Water Basin Covers
ACB Casing

Package and Unitary Models:

9100	7700	59100	
8800	7200	5900	ACB Casing and Louvers
8700	7100	47000	Asbestos/Neoprene Fill,
6600	6300	4700	Eliminators, Louvers, and
8500	6200	4600	Turning Vanes.
8400	6100	4500	ACB Fill Splashbars
		4400	

CSO, CPS, and CS:

ACB Casing and Louvers
ACB Eliminators
ACB Fill
Asbestos/Neoprene Fill
Asbestos/Neoprene Eliminators

MS:

ACB Eliminators
ACB Fill
Asbestos/Neoprene Fill
Asbestos/Neoprene Eliminators

SUMMARY OF REMOVAL AND HANDLING PROCEDURES
of
ASBESTOS-CONTAINING COOLING TOWER COMPONENTS

I. Safety requirements for all asbestos-containing material removal procedures.

A. Workmen will be required to wear half-face cartridge respirators during asbestos removal.

1. Air monitoring will be done routinely by Marley on all jobs that require more than 4 hours of monitoring time. Air monitoring will be done if required by the customer (additional money required to cover the cost of the tests). NOTE: Air sampling results of similar jobs within 6 months can be used to determine proper respiratory protection.

2. Workmen will wear protective Tyvek clothing on any asbestos containing material removal job.

a. At the end of the work day, the Tyvek will be disposed of as asbestos waste.

3. The work site will be roped off using a black and yellow tape and proper signs to warn of the asbestos hazard. The rope and signs will be 50' from the work site where possible.

4. The workmen will be trained as to the hazards of handling asbestos and proper handling procedures prior to the start of the job.

5. Notification of the job will be made to all applicable regulatory agencies.

6. All workers associated with asbestos removal work will receive physicals per OSHA requirements. These will be updated annually.

II. Asbestos cement board removal safety procedures summary.

A. Components will be removed one piece at a time being careful not to break, cut, or crush the component.

B. No cutting or breaking of the asbestos-containing material will be allowed.

1. If cutting or breaking is deemed the only way to remove a piece, then wet down procedures must be initiated.

C. The ACB components will be either placed in properly labeled 6 mil plastic bags or wrapped in a double layer of 6 mil plastic and sealed. Appropriate labeling will also be on the plastic wrap.

1. A viable alternative to the above would be a 6 mil plastic lined dumpster. The material must be laid carefully into the dumpster, not thrown. Extreme care must be taken to comply with EPA's "no visible emission" criteria.

III. Neoprene asbestos removal safety procedure summary.

A. These materials MUST be in a constant wet condition during removal and preparation for disposal.

B. The material will be placed in 12 mil plastic bags, sealed and appropriately marked.

C. If there is a large enough quantity, a 12 mil plastic lined dumpster may be used. The material must be placed very carefully in the dumpster to reduce or eliminate fiber generation.

D. Air monitoring will be done routinely by Marley on all jobs that required more than 4 hours of monitoring time. Air monitoring will be done if required by the customer (additional money required to cover the cost of the tests). If the results of prior test indicate that the work area is a "regulated area" (where airborne concentrations of asbestos exceed the PEL), then a clean room, shower, and equipment room decontamination area must be provided.

E. Half-face respirators and Tyvek protective clothing are required regardless of the airborne concentrations or asbestos.

EXCEPTIONS AND CLARIFICATIONS

1. ASBESTOS REMOVAL PROCEDURES:

An asbestos removal procedure is included in this proposal.

A. While Marley takes responsibility for removal of asbestos and loading to the carrier for transportation and may handle arrangements with the dump site as agent for the owner, the selection of the dump site remains the Owner's responsibility. All hauling and dump site documents will show the Owners's name as "Generator" of the asbestos containing materials.

B. Due to variations in local interpretation, any ruling requiring additional or different asbestos removal, handling, or disposal procedures will be clearly identified at the time of the ruling and charged as extra to the Owner. Marley will make every effort with the Owner's support to prevent extra charges.