

TO

E. J. Gellenbeck

DATE

March 4, 1975

C.C.

R. P. Medlin
E. D. Kaiper
E. W. Collins
P. J. Reilly

1

ASBESTOS HANDLING REQUIREMENTS

Attached are 50 copies of the "Asbestos Handling Requirements" for distribution and use within the refinery. This final draft has incorporated the comments of Operations and Engineering where possible. Employee Relations will develop an extract for inclusion in the Supervisor's Handbook.

J. L. Wescoat
J. L. Wescoat

RWMasters:eh
Attachments

PLAINTIFF'S EXHIBIT

MBL-186

014567

ASBESTOS HANDLING REQUIREMENTS

INTRODUCTION

Based on the rules and regulations promulgated under OSHA and by the EPA, all handling of asbestos bearing material requires special attention. This guide is intended to provide process and mechanical supervisors with a summary of the actions which must be taken when employees are working in an area where asbestos bearing insulation is being removed and handled.

COVERAGE

As of August 29, 1972, the Purchasing Department was instructed that all future purchases of insulating material must be asbestos free. It is difficult to differentiate, by appearance, between asbestos bearing and asbestos free insulation. To establish a guideline, friable insulating materials installed prior to January 1, 1973 will be considered to contain asbestos fibers and will be treated according to the following requirements. If the material can be positively identified as being asbestos free, the full requirements which follow need not apply.

The following list indicates those items which contain asbestos that are not considered to present a health hazard. These items are approved for use in the refinery without special handling precautions:

- Woven asbestos covered thermocouple lead wires
- Solid sheet asbestos gaskets
- Spiral wound asbestos packed gaskets
- Asbestos gloves
- Asbestos welding blankets
- Graphite or teflon impregnated woven asbestos packing

Any asbestos bearing materials, presently on hand or contemplated for purchase, that is not in the above list must be reviewed with a representative of the Safety Department and the Industrial Hygiene Department to determine if its use would require any special personal protective measures.

REQUIREMENTS

The following requirements are based on OSHA and EPA rules and upon

014562

three Industrial Hygiene Investigations conducted in the Beaumont and Paulsboro Refineries. They are intended to cover routine jobs where old insulation is removed; large jobs where demolition is involved may require additional precautions.

- 1.a. The plant representative involved in a job which will require the removal of asbestos bearing thermal insulation must notify a Safety Department Foreman to inform him of the nature of the intended work.
- b. Where small areas are removed for inspection of base metal, e.g. Sonoray, the method of removal is important. If the method of removal may generate significant airborne fibers, the precautions which follow must be observed. The worker cutting the area for inspection must wear an air purifying respirator regardless of the method of removal.
2. The plant representative must obtain sufficient respirators, caution signs, caution tags (see figure 1), heavy plastic bags, and safety tape to complete the job in accordance with the following requirements. These items are available from the Safety Storeroom.
3. Asbestos bearing material is best handled in a wet condition. It must be wetted to keep moist during the removal and handling period whenever possible.
4. In congested areas and in process units a safety tape barrier shall be installed to isolate the area where insulation is being removed. It is recommended that the safety tape be located 25 feet from the work area. Tape barriers are not required when small groups are working in isolated areas where other personnel are not likely to become involved.
5. All workers inside the area marked by safety tape must wear air purifying respirators as well as those workers actually handling the material. Respirators must be worn regardless of barricade or wetting practice.
6. Caution signs must be posted at all approaches to the area

014563

in which asbestos type insulation is being handled.

7. Employees who, according to a medical examination, cannot function normally with a respirator device shall not be assigned to work requiring a respirator.
8. All removed insulation shall be carefully placed in the plastic bags available from the Safety Department. When full, the bags shall be sealed and the caution tags attached in a readily visible location.
9. Piping and other equipment covered with asbestos insulation must not be dropped or thrown from buildings or structures. It should be carefully lowered to the ground. When jacketing has been removed from piping the insulation must be wetted before lowering.
10. The EPA must be notified at least 20 days before starting "demolition" work on asbestos covered piping and equipment. Routine maintenance and repair work is not to be considered as demolition and does not require notification. Examples of demolition which would require EPA notification are: Demolition of TCC-1, or major physical changes of a structure which bears asbestos insulation. The unit responsible for initiating demolition work must contact the Conservation Engineering Section at least 30 days before demolition activities are initiated so that they may forward the required notification to the EPA.
11. Sealed containers of asbestos scrap may be taken to the sanitary land fill area where it is buried. A plant representative must notify the Conservation Engineering Section before having the scrap hauled to the land fill area.
12. On jobs performed by contractors, it is the contractor's responsibility to conduct the job in accordance with the OSHA and EPA rules and regulations. The Mobil Contact or Construction Inspector should insure that the contractor is aware of his obligations to conform with these regulations. The contractor will provide his own signs, tags, bags, and barricade tape, etc.

014564