

Office Memorandum

To and Location) Directors, Managers, and Supervisors	DATE May 23, 1983
From and Location) R. F. Stubbeman	REFERENCE NO. RFS-580-83

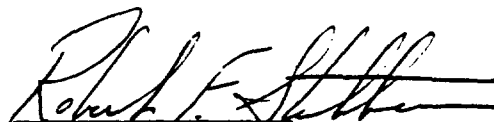
Asbestos Policy

PLAINTIFF'S
EXHIBIT
CEL-611

Attached is the Tech Center asbestos policy approved by the Management Safety Committee May 17.

Points to emphasize in your discussions of the Policy with your people are:

- 1) Every effort should be made to use materials which do not contain asbestos - Zetex^R is a recommended substitute.
- 2) No more than five feet of sleeving, rigid insulating asbestos, or loose asbestos material should be removed by the general work force - maintenance people with special training must remove larger quantities.
- 3) Special disposal procedures for asbestos apply to all quantities of asbestos.
- 4) If we cannot be certain that a material to be removed is not asbestos, test it or treat it as asbestos.


R. F. Stubbeman

dsc

cc: D. C. Porter - Policy Handbook Committee
Bruce Melaas - Dallas
Central Files

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Handling And Disposal Of Asbestos

This policy and procedure is to assure that no employee is exposed to excessive concentrations of asbestos fiber dust and that asbestos and asbestos - containing material is disposed in an environmentally safe manner. The standards to be met are found in the Occupational Safety and Health Act (29CFR 1910.1001), the Environmental Protection Agency Regulations (40CFR 61.20 - 61.25) and the Texas Air Control Board Regulations (which incorporate the EPA Regulations).

POLICY

All operations involving the handling of loose asbestos material (powders) or asbestos manufactured products that are friable (crumble or pulverize such as insulation, coatings, cements) or materials that are firmly bonded but when cut, sawed or otherwise reshaped, evolve asbestos fibers will be performed in accordance with strict procedures described below. All unidentified insulation materials will be considered and handled as asbestos until identification can be made. Every effort should be made to use materials which do not contain asbestos. Removal of asbestos containing insulation shall be done by designated employees who have received training and instructions in personal protective measures, disposal procedures, and the potential hazards of asbestos dust exposure.

GENERAL

The Regulations impose requirements for reporting the removal of asbestos or asbestos containing material, depending on whether the removal is defined as renovation or demolition, and on the quantity removed. The EPA definitions are:

- (1) "Demolition" means the wrecking or taking out of any load-supporting structure member and any related removing or stripping of friable asbestos materials.
- (2) "Renovation" means the removing or stripping of friable asbestos materials used on any pipe, duct, boiler, tank reactor, turbine, furnace, or structural member. Operations in which load-supporting structural members are wrecked or taken out are excluded.

Before beginning work on any material which might be asbestos, make sure you can prove it is not asbestos, or else treat it as though it were asbestos. The Safety Supervisor can help you obtain analytical information on suspected material to establish its identity. He will also help identify material which should be tested.

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REPORTING

We must always notify the Texas Air Control Board (TACB) in advance with respect to demolition without regard to quantity. We only notify in advance with respect to renovation when we are in excess of the quantity limits. The Safety Supervisor will notify the TACB when the responsible supervisor informs him of the planned operation. There are time requirements to be met. See the requirements below when planning removal.

1. Demolition Operation

Where more than 260 linear feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed, written notice must be at least ten days prior to commencement of the demolition. When the quantities are below these amounts, written notice must be twenty days prior to commencement.

2. Renovation Operation

Where the total job involves more than 260 linear feet of pipe insulated or fireproofed with friable asbestos material or more than 160 square feet of friable asbestos, written notice will be "as early as possible" PRIOR to commencement of renovation.

PROCEDURES FOR REMOVING ASBESTOS

1. Work Area

The work area must be marked off with signs. See the Safety Supervisor to obtain the specified signs. Plan to place the old asbestos or asbestos covered material in a place where the dust can't be picked up by the wind. You may need to plan on covering the waste when not adding more waste. The waste accumulation area must be marked with signs. It is best to place the waste in drums or bags to be sealed immediately. The asbestos dust and particles must be within the marked off area. Dust inside the area must be vacuumed or swept up daily. It must be wet down when sweeping to avoid dusting. All the loose swept dust must be bagged. The bags must be labeled with a specified label. Never use high pressure air to clean up an area where there is asbestos.

2. Personal Protection Equipment and Hygiene

Certain protective equipment for employees in the marked off area is required by regulation. Please discuss the work with the Safety Supervisor and he will help get the right equipment. The regulations prohibit smoking or chewing tobacco in a marked-off area. When work is

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completed each day, protective clothing must be removed in the designated work area. The used protective clothing is treated just like the loose asbestos and must be bagged with the other waste. After finishing the day's work and leaving the area, immediately wash your hands, arms, face and neck.

3. Spill Clean Up

If asbestos material is spilled outside a designated area, it must be cleaned up immediately, using all the procedures and protective equipment required in a designated work area. Keep unprotected employees away from the spill. Make sure dust is not spread by wind or water.

4. Asbestos Waste Disposal

Asbestos waste must be transported in closed drums or bags. The sealed drums or bags must be kept in one of the two areas we have designated for hazardous waste disposal while waiting for final disposal. See the Safety Supervisor about the proper final disposal of the material.

WORKING WITH ASBESTOS MATERIAL

1. Every effort should be made to avoid putting asbestos containing material into new service. A suggested, tested material is "Zetex" made by Newtex Industries. Commonly used forms of "Zetex" will be stocked in the warehouse.
2. When cutting or drilling into asbestos material, keep it wetted to prevent dusting. If dusting cannot be prevented, special exhaust systems which collect the dust will have to be used. The collected dust must be treated as in removal. A dust respirator will be worn if dusting occurs.

DESIGNATED EMPLOYEES FOR ASBESTOS REMOVAL

1. The Maintenance Supervisor will designate two Mechanics to receive training and remove asbestos material. These mechanics will receive training in the hazards of asbestos exposure, protective equipment, work practices, and disposal of asbestos. The Safety Supervisor will assist the Maintenance Supervisor in providing training and instruction.
2. All renovation requiring the removal of more than five feet of sleeving, rigid insulating asbestos material, or any loose asbestos material, will be performed by the mechanics designated to remove asbestos. The mechanics' exposure to asbestos fibers will be monitored initially for each type of renovation or demolition designated by the Safety Supervisor.

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3. The Safety Supervisor will designate which jobs should be additionally monitored.

RESPONSIBILITY

1. The Supervisor approving the work request is responsible for noting on the request that an asbestos hazard may exist.
2. The Supervisor for the work being performed or serving as the contractor - contact is responsible for seeing that these procedures are followed.

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