



GEN 35 (REV 6)

Interoffice Memorandum

TO (Name and Location) *As Listed	DATE July 27, 1979
FROM (Name and Location) J. M. Mullins ✓	REFERENCE NO. JMM-743-79

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Asbestos Handling Procedures

The attached draft of the plant procedures for handling asbestos containing waste materials has been updated to reflect your comments. Please review the attachment and attend the meeting scheduled for 9:30 a.m., Wednesday, August 8, 1979 in the south conference room.

Your presence, comments and/or recommendations are requested whereby the plant procedures can be finalized.

J. M. Mullins
J. M. Mullins

/mh

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CELANESE CHEMICAL COMPANY, INC.
Pampa Plant

Asbestos Handling Procedures

Part A

Purpose

- To establish a procedure for handling materials made of, or containing asbestos.
- To comply with OSHA Asbestos Standards 1910.1001.
- To comply with EPA Standards for the removal and reporting requirements contained in the October 14, 1975 Federal Register as amended March 2, 1977 and June 19, 1978.

OSHA Asbestos Standards

Permissible exposure to airborne concentrations of asbestos fibers. Standards effective July 1, 1976. The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employ may be exposed shall not exceed two (2) fibers, longer than five (5) micrometers per cubic centimeter of air.

Ceiling Concentration - No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 (10) fibers, longer than five (5) micrometers per cubic centimeter of air.

EPA Requirements

Any owner or operator of a demolition or renovation operation who intends to demolish any institutional, commercial, or industrial buildings, structure, facility, installation, or portion thereof which contains any pipe, duct, boiler, tank reactor, turbine, furnace, or structural member that is insulated or fire-proofed with friable asbestos material will be covered by the following procedures Part A.

Demolition and Renovation

The requirements of the Pampa Plant procedures, Part A, is exempted provided the amount of friable-asbestor materials removed or stripped from (1) pipe does not exceed 80 meters (260 feet), or (2) less than 15 square meters (160 square feet) from any duct, boiler, tank, reactor, turbine, furnace, or structural member.

Demolition

Means the wrecking or taking out of any load supporting structure member and any related removing or stripping of friable-asbestos materials.

Renovation

Means the removal or stripping of friable-asbestos material used on any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member. Operations in which load supporting structure members are wrecked or taken out are excluded.

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Friable Asbestos

Means any material that contains more than one (1) percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand.

Policy

All employees involved with removal, clean-up, and/or disposal of asbestos containing insulation (ACI) will be informed of the health hazards associated with the handling of these materials.

All unidentified insulation will be handles as an ACI. All non-ACI will be color coded or identified.

Reference the Federal Register/Vol. 44 No. 136/Friday, July 13, 1979, wherein EPA proposes:

There is no doubt that asbestos is a human carcinogen and no safe or threshold level of exposure to asbestos has been established. EPA believes that any exposure increases a persons risk of developing lung cancer, mesothelioma, asbestosis or other diseases.

Procedures

The Environmental Coordinator will be notified of proposed/planned work scheduled to remove ACI in amounts equal to, or greater than that described in the introductory paragraph, Purpose.

The work area will be roped off during the removal of ACI and warning signs posted to restrict entrance into the area.

The supervisor, Celanese or contract, who is responsible for the craftsperson will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other supervision in the plant, Celanese and/or contract, to insure that asbestos is not handles by any other employee.

The Safety Department and the plant Industrial Hygienist will be notified when asbestos handling work is scheduled. They will be responsible for obtaining the required samples and the sampling results.

Protective Clothing

The use of disposable coveralls is required. They will be removed following completion of the job and placed in a plastic burial bag labeled with an approved caution tag.

Either single use type or any other approved respirator is required. The single type respirator will be disposed of as described above.

Rubber boots and gloves are required; they will be thoroughly washed after each use.

Slicker suits may be worn in place of the disposable coveralls during cold weather. They will be thoroughly washed after each use.

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Only clean or new protective clothing will be stored in lockers used for street clothing.

CAUTION: At no time is compressed air to be used for dusting off skin or clothing.

Drilling or Sawing Transite

1. The immediate work area must be marked off with approved caution signs to prevent unauthorized personnel from entering the area.
2. A tank type vacuum pump with disposable bags will be provided with hoses connected to electric saws or drills to prevent airborne asbestos dust. The disposable bag will be periodically inspected and replaced if damaged.
3. A plastic sheet should be attached to the back side of the transite to form a dust collection bag.
4. The disposable bag (Part A.3) and the plastic sheet (Part A.4) will be disposed of in plastic bags in approved landfill sites.

Insulation Removal

1. Unless marked, all insulation removed will be treated as prescribed in asbestos handling procedures.
2. The immediate work area will be marked off with approved caution signs to prevent unauthorized personnel from entering the area.
3. All asbestos containing materials will be adequately wetted during (prior to) removal.
4. All asbestos containing materials will be removed from pipes, ducts, etc., prior to dismantling any structure.
5. After removal, all asbestos containing waste materials shall be sealed into leak-tight containers while wet and deposited in an approved landfill site.
6. Asbestos containing waste materials shall not be dropped or thrown to the ground but shall be carefully lowered to the ground. Asbestos that has been removed more than 50 feet above ground level, except asbestos removed as units or in sections, shall be transported to the ground via dust-tight chutes or containers.
7. When asbestos containing materials are not wetted due to freezing temperatures (32°F or less), such as materials on pipes, ducts, boilers, tanks, reactors, turbines, furnaces or structural members shall, to the maximum extent possible, be removed as units or in sections prior to wrecking.
8. The immediate work area will be immediately cleaned and washed down.
9. All sealed, tagged bags will be buried in an approved landfill site. The sealed, tagged plastic bags will be handled, transported and deposited in the landfill site in a cautious manner to insure that the bag is not torn or destroyed.

Training

All personnel involved with the removal, clean-up, and disposal of asbestos containing materials shall be informed of the health hazards associated with handling asbestos.

Medical Examinations

The number of employees exposed to asbestos will be kept at a minimum. Each employee who handles asbestos will be required to have a pre-employment medical examination, an annual medical examination, and a termination medical examination. Records will be retained by the plant for 20 years.

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Part B

Purpose

To establish plant procedures for handling ACI and/or materials in quantities less than those regulated by EPA.

Policy

As defined in Part B.

Procedures

The supervisor, Celanese or contract, who is responsible for the craftsperson will be directly responsible for the assigned employees adhering to these procedures. It will be the responsibility of all other line supervision in the plant, Celanese and/or contract, to insure that asbestos is not handles by any other employees.

Protective Clothing

The use of disposable coveralls is not required when the amount of insulation to be removed is some three (3) feet or less. They are, however, required when more than three (3) feet of ACI is removed.

Single use type respirators are required.

Drilling and Sawing Transvite

A tank type vacuum pump with a disposal bag will be provided with hoses connected to electric saws or drills to prevent airborne dust. The disposable bag will be periodically inspected and replaced if damaged.

The work area will be immediately cleaned and water washed. The disposable bag and/or accumulated dust will be transferred to a plastic bag and disposed of in an approved landfill site.

Insulation Removal

Unless marked, all insulation removed will be handles as ACI. Insofar as practical, all ACI will be adequately wetted during (prior to) removal.

All ACI will be removed from pipe, ducts, etc., prior to dismantling any structure.

After removal, all ACI will be sealed into leaktight plastic containers while wet and deposited in an approved landfill site. ACI and/or waste materials shall not be dropped or thrown to the ground, but shall be carefully lowered to the ground.

Upon completion of an assigned job, the craftsperson will immediately clean (wet sweeping) and wash down the work area.

All sealed/tagged plastic bags will be buried in an approved landfill site.

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Training

All personnel involved, (as in Part A).

Medical Examinations

(As in Part A.)

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