

INTERNAL CORRESPONDENCE

 <u>EHMD-MS</u> (UNIT)	TO	Tom Sands	DATE	March 4, 1988
	FROM	Janet Smith <i>JS</i>	SUBJECT	Sulfolane Unit Asbestos

A bulk insulation sample was taken on February 22, 1988 from insulation material found on the ground in the middle section of the Sulfolane Unit. The insulation had been removed by a contractor during the turn-around activities. The analytical results (attached) indicate the sample was positive for asbestos. These results were discussed with C. DeYong on February 25, 1988.

The potential for health effects associated with asbestos exposure dictates close supervision and control of projects involving handling of asbestos containing materials. Southwestern procedure #65 sets forth stringent practices designed to minimize employee exposure to asbestos. W. Litton indicates that asbestos handling is specifically addressed along with other health and safety matters during the contractor's briefing prior to entry into the facility. Even so, in this instance, the contractor apparently disregarded the facility procedures.

To preclude a similar incident in the future, I recommend the importance of following facility procedures be strongly emphasized to the contractors during the orientation meetings and to the Southwestern employees assigned to "Contract Supervision."

Should you have any questions, please contact me at extension 2534.

JS/lh

xcs: C. DeYong
E. R. Goltra, M.D.
W. Litton
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SWRf/Asbestos 2085

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SJB

TWS →

GKC

XC: W. LITTON

T. HOOVER

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C. DeYONG

Please follow the attached ^{Jul 8 3-7-88} guidelines when asbestos removal is required by a contractor at your facility.

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INTERNAL CORRESPONDENCE

 Med. Serv. (UNIT)	TO	DISTRIBUTION	DATE	February 17, 1988
	FROM	E.R. Goltra, M.D.	SUBJECT	Asbestos Abatement Contractors

The following guidelines are to be followed whenever the decision is made to proceed with asbestos abatement at a Kerr-McGee facility. These guidelines are written to assure uniformity of performance in the abatement process and to guarantee compliance with the complex and restrictive federal, state, and local standards established to protect employee and public health.

The steps of the guideline are presented in their order of occurrence and are as follows:

- o When the need for asbestos abatement is identified, the Corporate Medical Services must be notified. Medical Services will then prepare the basis for bids document jointly with the Corporate Legal Department. The basis for bids document contains the scope of the project and specific directions to the potential contractor concerning standards to be attained, necessary work practices, safety and worker health procedures, legal and contractual obligations.
- o Facility management will then seek solicitation of bids from qualified asbestos abatement contractors. Included as information to the potential contractor is the basis for bids document. The response to this document from the bidders then must be reviewed by Corporate Medical Services, the Corporate Law Department, the Corporate Insurance Department, and the facility management. This review will include an assessment of technical qualifications and the ability to comply with basis of bids specifications.
- o The above four groups must agree on a potential contractor with respect to qualifications, performance ability, and insurability. Primary consideration must be given to these factors and not the size of the bid. This is an important point to remember.
- o When the contract is let to a successful bidder, the Corporate Medical Department must be notified. The Medical Department then has responsibility for monitoring the progress of the abatement process from the viewpoint of contractual compliance and worker safety

Following these guidelines will hopefully, avoid confusion which has surrounded some asbestos abatement work accomplished in the past.

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SWRf/Asbestos 2088

SOUTHWESTERN REFINERY ASBESTOS PROGRAM

I. PERMISSIBLE EXPOSURE LIMIT (PEL)

- A. No employee shall be exposed to an airborne concentration of asbestos, tremolite, anthophyllite, actinolite or a combination of these minerals in excess of 0.2 fiber per cubic centimeter of air as an eight hour time-weighted average (TWA).
- B. The Safety Office will be notified whenever asbestos is removed. Exposure shall be determined from breathing zone air samples that are representative of an eight hour TWA of each employee.
- C. Employees will be notified in writing of the results of the monitoring as soon as possible.

II. ENGINEERING CONTROL AND WORK PRACTICES

Any of the following control methods shall be used to achieve compliance with the PEL

- A. Vacuum cleaner equipped with HEPA filters
- B. Enclosure or isolation
- C. Use of wet methods, wetting agents or removal encapsulants
- D. Use of glove bags
- E. Prompt disposal of wastes in leaktight containers

III. RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING

- 1A. Half face airpurifying respirators with high efficiency filters shall be worn at all times when airborne concentrations of asbestos are not in excess of 2 f/cc. For exposures exceeding 2 f/cc, respirators shall be selected in accordance with Table D4 of 1926.58.
- B. An employee shall be evaluated by a physician to determine that an employee will be able to function normally wearing a respirator.
- C. Qualitative fit tests will be performed every six months.
- 2A. Disposable coveralls, head coverings, gloves, and foot coverings shall be worn at all times.
- B. Contaminated clothing and respirator cartridges shall be placed in impermeable bags and properly labeled for disposal.

IV. HYGIENE FACILITIES AND PRACTICE

- A. Protective clothing and respirators must be put on before entering the asbestos work area.

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IV. HYGIENE FACILITIES AND PRACTICE cont.

- B. Before removing protective equipment, all tools shall be decontaminated and all asbestos materials placed in disposable bags.
- C. Protective clothing shall be cleaned with a HEPA vacuum before removing.
- D. Wash face and respirator before removing the respirator.
- E. All employees must shower after each asbestos exposure job.

V. WARNING SIGNS

- A. Warning signs shall mark the asbestos work area.
- B. Asbestos shall be disposed of in properly labeled bags and should include the following:
 - Danger
 - Contains asbestos fibers
 - Avoid creating dust
 - Cancer and lung disease hazard

VI. EMPLOYEE TRAINING

All employees exposed to asbestos shall be trained annually. The training shall include the following:

- A. Methods of recognition
- B. Health effects
- C. Relationship between smoking and asbestos exposure
- D. The nature of operations that could result in exposure
- E. The purpose, proper use, fitting instructions, and limitations of respirators
- F. Appropriate work practices
- G. Medical surveillance requirements

VII. MEDICAL SURVEILLANCE

- A. Medical examination prior to initial assignment and annually thereafter shall be made available.
- B. Medical examinations shall include:
 - 1. Medical and work history directed to pulmonary, cardiovascular, and gastrointestinal systems

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VII. MEDICAL SURVEILLANCE cont.

2. A standardized questionnaire shall be filled out, and on annual examination, the abbreviated questionnaire will be used.
3. The physical examination shall include a chest roentgenogram and a pulmonary function test. Interpretation of chest roentgenogram shall be performed by a B Reader, a board eligible/certified radiologist, or an experienced physician in pneumoconioses.

VIII. THE FOLLOWING INFORMATION SHALL BE PROVIDED TO THE PHYSICIAN

- A. A copy of 1926.58 and Appendices D, E, and I
- B. A description of the affected employee's duties as they relate to exposure
- C. The employee's representative exposure level
- D. Description of personal protective equipment and respirator used.

IX. THE EXAMINING PHYSICIAN SHALL FORWARD TO THE SAFETY MANAGER A WRITTEN OPINION INCLUDING THE FOLLOWING:

- A. Whether the employee has detected medical conditions that would place the employee at an increased risk of health impairment from asbestos exposure
- B. Any recommended limitations on the employee or use of personal protective equipment
- C. A statement that the employee has been informed by the physician of the results of the medical examination
- D. The written opinion shall not reveal specific findings or diagnoses unrelated to occupational exposure to asbestos
- E. A copy of the physician's written opinion shall be given to the affected employee within 30 days of receipt.

X. RECORDKEEPING

- A. Employee exposure records shall be maintained for at least 30 years.
- B. A copy of information provided to the physician and a copy of the physician's written opinion shall be kept in the employee's file
- C. A copy of the employee's medical examination results including medical history questionnaire responses and result of any tests shall be kept in the medical files
- D. All medical records shall be maintained for the duration of employment plus thirty years

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X. RECORDKEEPING cont.

E. Training records shall be maintained one year beyond the last date of employment.

XI. MISCELLANEOUS

A. All employees will receive asbestos training in order to become familiar with methods of recognition and appropriate work practices.

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