

*file: Asbestos, Alcoa Policy (6)*

C. F. DIMASCIO

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1989 August 21

RE: ALCOA CORPORATE ASBESTOS MANAGEMENT POLICY

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Asbestos. CLR

1989 August 13

ALCOA CORPORATE ASBESTOS MANAGEMENT POLICY

**SCOPE:**

Proposed policy will apply to all Alcoa owned or controlled facilities including industrial as well as office buildings. Relevant aspects of the policy should also extend to properties leased by Alcoa where these programs should be required of building owners. The following objectives define a core policy: where local regulations or special circumstances dictate, more rigorous practices can be established.

**POLICY OBJECTIVES:**

1. Uniform and consistent practices are hereby established for the purchase of facilities, equipment and new products and for the divestiture of equipment and facilities including real estate.
  - A. Environmental surveys conducted prior to purchase of new facilities shall involve asbestos surveys and risk assessments. Full compliance with all Alcoa asbestos management policies will apply if properties with asbestos are purchased.
  - B. Only non-asbestos products will be purchased. Every effort will be made to find non-asbestos substitutes for the remaining asbestos containing products used in Alcoa facilities. Deviations from this policy will require signed documentation by the location Procurement Manager. Records must be kept of asbestos products purchased in exception to this policy.
  - C. Equipment sold by Alcoa must be free of asbestos prior to sale. Exceptions can only be made by Pittsburgh Environmental Control. Where exceptions are granted, written disclosure of the presence of asbestos will be required.
  - D. Before the sale of real property, an asbestos survey shall be conducted. All friable asbestos materials will be removed. In some cases, non-friable asbestos materials should also be removed if it is suspected that the future use of the property will subject them to damage, thereby releasing asbestos fibers. In addition, buyers will be informed in writing of the presence of non-friable asbestos in buildings which are sold.
2. Surveys to determine the presence of Asbestos Containing Materials, "ACM" (greater than 0.1 % of any fibrous asbestos mineral forms) shall be conducted for all Alcoa facilities. Surveys must follow the general format recommended in the Alcoa Engineering Standard on Asbestos Surveys and note the condition of ACM in addition to the location accessibility and an estimate of the quantity.
3. Facilities having any asbestos containing materials will develop written Asbestos Management Programs to address:
  - A. Identification of ACM via direct labels or any of the alternatives to direct labeling which would be acceptable under OSHA Hazard Communication.
  - B. Communication of the presence of asbestos to facility employees and contractors who work in areas where asbestos is present.

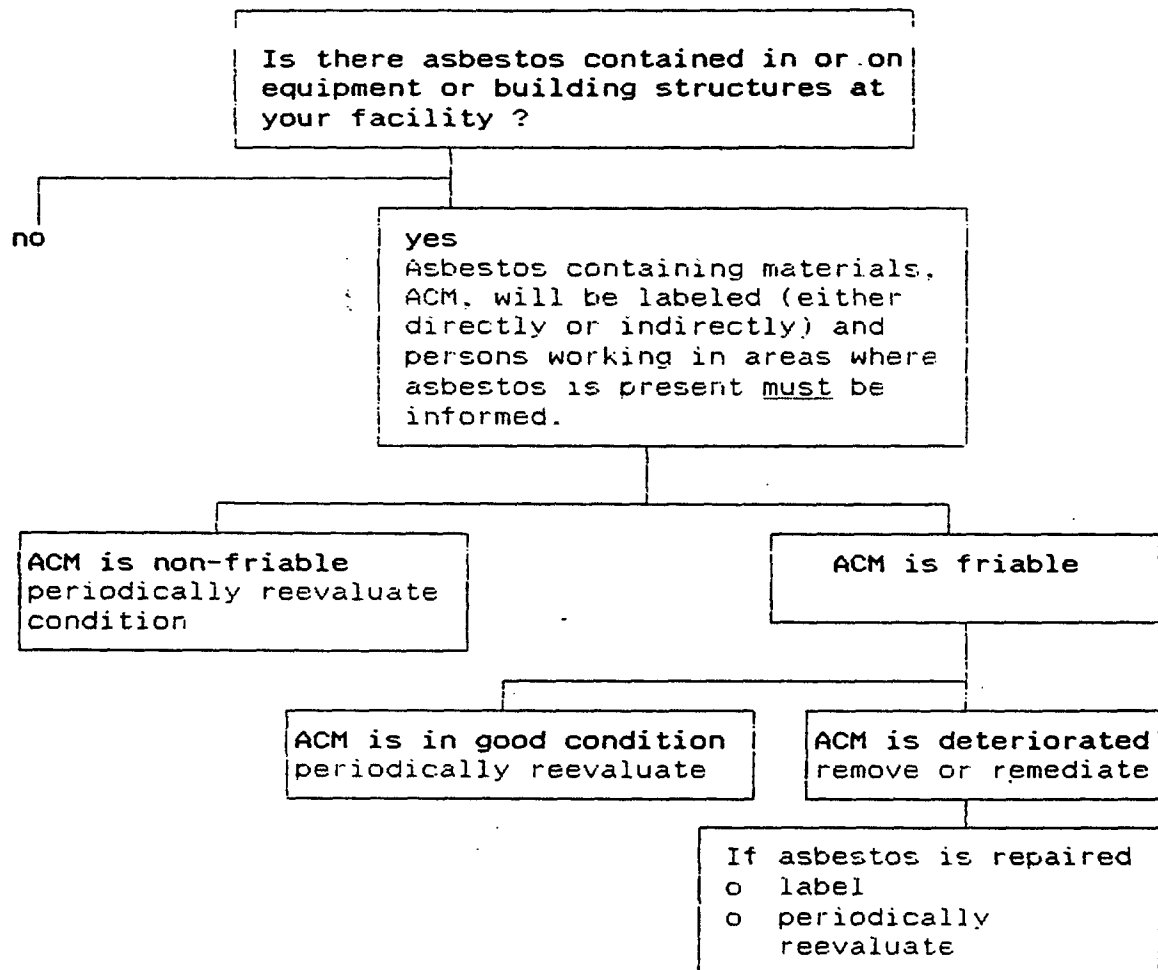
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- C. Plan for reinspection of ACM on a periodic basis (minimally, every 3 years).
- D. Remediation, through removal, repair, enclosure or encapsulation of ACM in a deteriorated condition (Attachment 1).
- E. All Asbestos work must be carried out in compliance with all relevant Federal, State and local regulations (ref. Alcoa Engineering Standard 18.18 "Asbestos Removal Standard").
- F. Operation and Maintenance procedures will be defined to prevent employee exposure to asbestos during normal day-to-day operation of facilities where ACM is present.
- G. All asbestos contracts will be written in Pittsburgh in close cooperation with the various field Procurement Departments and will be retained for the 30 year retention period in accordance with the 1989 Pittsburgh Procurement policy (Attachment 2).
- H. Plan to address any asbestos release emergencies which might occur in the facility. In addition to noting this plan in the facility Asbestos Management Plan it is suggested that the SPCC (Spill Prevention Control and Countermeasures Plans) could be revised to include this contingency.
- I. Long range strategic plans must be made with the knowledge that at the end of a facilities life, prior to its sale or demolition, all friable asbestos must be removed.

Attachment 1

MANAGEMENT OF ASBESTOS CONTAINING MATERIALS IN ALCOA FACILITIES



**ACM** - Asbestos Containing Materials both friable and non-friable materials containing > 0.1% fibrous asbestos mineral forms.

**Friable** - EPA definition - asbestos containing materials which can be crushed with hand pressure. Examples of friable asbestos include sprayed on fireproofing, most asbestos insulation and any other ACM which is deteriorated to the point that it can be crushed with hand pressure.

**Non-friable** - Examples asbestos include transite (asbestos cement products) and vinyl asbestos tile.