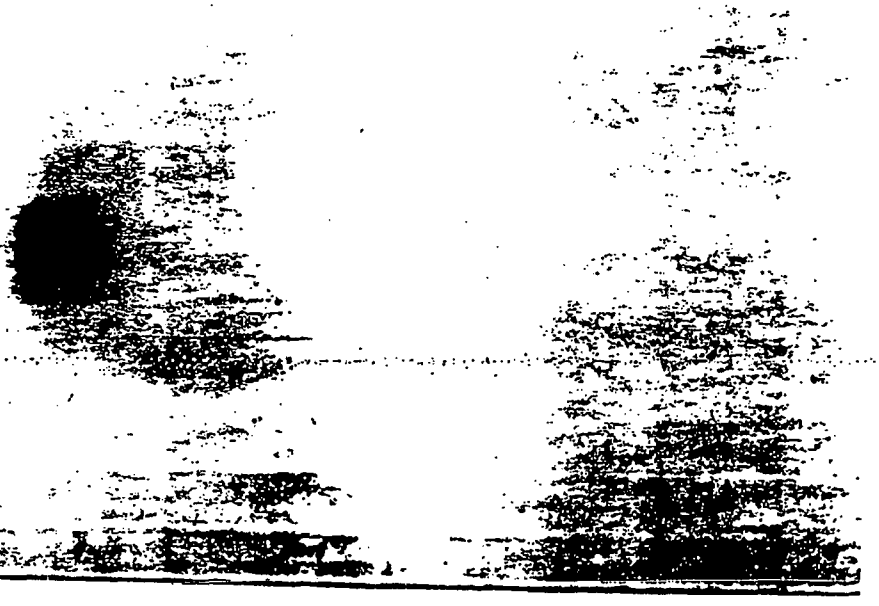
#56 - 8 SITE COE

Steve Dixon



DUP 0909192.001

Asbestos Issues Committee Function

To: Recognize emerging asbestos (and other respirable fiber) issues and see that those with wide impact are addressed

In a Way That:

Considers health, regulatory, liability and cost concerns

Is coordinated with the Corporate Asbestos Program

Involves participation from Medical, Industrial Hygiene, Legal, Public Affairs, Employee Relations, Workmans Compensation, Manufacturing and other pertinent perspectives

So That:

Employee health, regulatory, liability and other concerns are addressed in a cost effective manner

Asbestos Issues Committee

S. W. Dixon - S&OH - CHAIR

A. S. Berg - S&OH/Polymers

J. G. Gleich - Consol

R. E. Kasch - Human Resources

L. A. Legendre - Conoco

J. F. McAllister - External Affairs

C. P. Mihal - Fibers

W. J. Mottel - S&OH

L. J. Natale - Automotive Products - TIMS

R. S. Price - Environmental

J. L. Riddle - N. E. Region/Asbestos Program Manager

J. D. Shomper - Legal - Litigation

R. R. Strocko, MD - Medical

P. W. Truax - Workers Compensation

J. T. Williamson - Legal - Compliance

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Asbestos Issues Committee - Recent Activity

EQC? Guideline II-I issued "Management of Materials which Contain Asbestos or other Respirable Fibers"

Global asbestos Engineering Standard (revised S4T) prepared

Global NARF S&OH Guideline (9.10)/Engineering Standard (S15T) prepared

S&OH Bulletins issued on OSHA Compliance (smoking, excursion limit) and EPA NESHAP revision

Submitted comments on OSHA Remand Issues Rulemaking

Medical Guideline 5 Revised

- Standard ARC terminology and diagnosis wording
- Use of CT scan to obtain accurate diagnosis - borderline ARC
- Clarify DuPont requirements versus OSHA requirements
- Provide clearer guidance on who needs DuPont or OSHA Program

Asbestos Issue Manager(s) established to blitz management issues

- Much valuable work begun - closure needed

"ASBESTOS" STAKE IN DU PONT

- ❑ Employee Health
- ❑ Removal Cost
- ❑ Liability
- ❑ Management

JLR Copy

PROPOSAL

- "Asbestos" is an issue for which ERC should have value.
- Form Asbestos Focus Group (utilizing Asbestos Issues Committee and ERC Liaison).
- Review "Asbestos" issues outlined by A.I.C. and determine:
  - If issues outlined are the right ones to work on.
  - If groups identified to lead particular issue are right groups.

ASBESTOS ACTIVITIES

CORPORATE (ERC/AIC)

- ❑ Develop policies, practices, etc. for Du Pont.
- ❑ Develop inspection/assessment guidelines for comprehensive program (document practices and options for EPA Neshaps compliance).
- ❑ Maintain network of resources throughout the Company.
- ❑ Redefine and continue lab QA/QC program.
- ❑ Maintain Corporate Respirable Fibers System.
- ❑ Update businesses/regions/sites on changes in regulations and best practices.

MLS

- ❑ Develop removal/contracting best practices - administration guideline.
- ❑ Develop integrated quality/cost abatement supplies program.
- ❑ Review and resolve contractor liability insurance issue.

BUSINESS

- ❑ Provide consultation and on-site inspection/management assistance to sites (options: Fibers, TIMS, MLS/vendors).

SITE

- ❑ Manage their own own asbestos program and coordinate training specific to their site.

PLANNING FOR THE INSPECTION

REVIEW OF PREVIOUS INSPECTION RECORDS AND BUILDING DRAWINGS

1. Scheduling of the Inspection
2. Obtaining Access
3. Building Record Review
4. Probable Homogeneous Areas According to Drawings
5. Consultation with Maintenance and Operations Personnel
6. Previous Inspection and Sampling Reports
7. Previous Abatement Records
8. Maintenance Records
9. Exclusions for Previously Performed Inspections (763.99)
10. General Planning Comments

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1. SCHEDULING THE INSPECTION

Nights

Weekends

Business hours

School hours

Contract

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2. OBTAINING ACCESS

Locks (keys)

Ladders/Lifts (Safety!!)

"Unused" or "Unimportant" spaces

Inaccessible spaces

Unknown spaces (dimensional accountability)

Contract

3. BUILDING RECORD REVIEW

Drawings

Specs

Construction contract

Bid documents (alternates)

Change orders

Pay requests (dates)

Construction field reports

Maintenance records

Original construction

Additions/Renovations

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4. PROBABLE HOMOGENEOUS AREAS ACCORDING TO DRAWINGS

Design drawings

Contract document drawings

As-Built drawings

Shop drawings (Hyatt disaster)

Floor plans

Sections

Finish schedule

Mechanical/Plumbing/Electrical

Structural

5. CONSULTATION WITH MAINTENANCE & OPERATIONS PERSONNEL

Maintenance procedures

Maintenance schedules

Operations procedures

Operations schedules

M/P/E design/location/operation

"Unused" or "Unknown" spaces

Passed ACM disturbance

Current ACM procedures

O & M procedures?

Management sophistication

Employee sophistication

6. PREVIOUS INSPECTION AND SAMPLING REPORTS

Location and pattern of samples?

Number of samples?

Composition of samples?

Condition of ACM?

Type and use of ACM?

Other data applicable to AHERA

Assessment categories and your assessment methodology?

Must be field verified

Do exclusions apply?

Are some samples applicable?

Must the entire survey be redone?

How was nonfriable ACM addressed?

Was any suspect ACM indicated?

7. PREVIOUS ABATEMENT RECORDS

Location

Methods

Disposal

Clearance criteria

Worker training

Residual contamination?

Urgent response action needed?

Special cleaning needed?

8. MAINTENANCE RECORDS

HVAC filter changes

TSI disturbance

O & M procedures?

Schedules

Routines

Emergency

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9. EXCLUSIONS FOR PREVIOUSLY PERFORMED INSPECTIONS (763.99)

For homogeneous areas or sampling areas

Friable ACBM was identified

Nonfriable ACBM was identified

No ACBM is present (inspector)

No ACBM is present (lead agency)

Suspect ACBM is assumed ACM

All ACBM has been properly removed

No ACBM specified or used

Must assess friable

Has nonfriable become friable?

Must assess newly friable

READ THIS SECTION ! !

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10. GENERAL PLANNING COMMENTS

2 major divisions of suspect ACBM

Accessible Space

Inaccessible Space

Assumptions

Building conditions

Survey Conditions