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INTEROFFICE CORRESPONDENCE

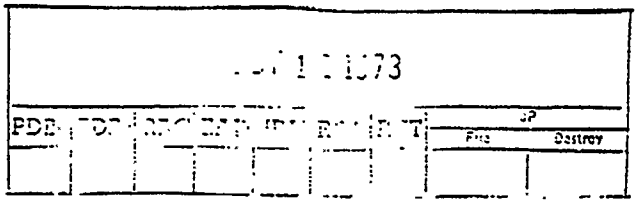
DATE October 10, 1973

JLW

TO E. T. Gellenbeck

C. C.

ENGINEERING E. T. GELLENBECK



BEAUMONT REFINERY PROJECTS
ASBESTOS HANDLING GUIDE
FILE: 105-100-14 x 105-100-27

Per your request we have reviewed the Asbestos Handling Guide transmitted to you by J. L. Wescoat's letter of September 7, 1973. We have the following comments on that guide and J. L. Wescoat's transmittal letter.

1. Compliance with OSHA and/or EPA is primarily the responsibility of the contractor or subcontractor handling the work. The Construction Group of the Project Task Force has the obligation to advise the contractor in all instances where he is observed to be in violation of OSHA or EPA standards.

2. The Project Manager or Project Engineer on any project involving asbestos handling will notify the Conservation Engineering Section who will then notify the Manager of EPA prior to demolition of facilities containing asbestos. It appears that the scope of demolition work requiring EPA notification should be clarified. For instance it should be determined if Mobil should notify EPA if the work consists of only a removal of a short section of asbestos covered piping to make piping tie-ins.

3. J. L. Wescoat's letter of September 7 states that Safety and Security will obtain the necessary signs and labels that are called for in the standards. It is proposed that in cases where the contractor is handling asbestos insulation he should furnish and post signs in conformance to OSHA and EPA regulations. In cases where Mobil personnel are doing the work Safety and Security should obtain and post the signs as required.

R. R. COLLINS

SCSmith:ss

PLAINTIFF'S EXHIBIT

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