

Memorandum

San Francisco, CA
October 24, 1986

PLAINTIFF'S EXHIBIT

CHV-773

NEW OSHA ASBESTOS STANDARDS

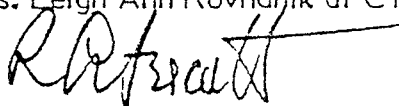
OFFICERS AND DEPARTMENT HEADS - CORPORATION
HEADS OF OPERATING COMPANIES

The Federal Occupational Safety and Health Administration (OSHA) promulgated two new Asbestos Standards on June 20, 1986; 1926.58 on construction activities and 1910.1000 on General Industry. Corporate Industrial Hygiene has developed an Asbestos Compliance Guideline to provide guidance to Chevron facilities on how to comply with the two standards, and interpretation of key provisions of the two standards. The Executive Summary of the Guideline is attached.

OSHA has not yet developed an official interpretation for industry nor for OSHA field compliance officers on how to apply the two new standards to manufacturing facilities. A major effect that this will have on Chevron facilities is the need to determine which of the two standards applies to each particular job involving asbestos insulation. We believe that the decision criteria outlined in the Guideline are reasonable and supportable in case of a challenge.

These two new standards will affect all Chevron facilities covered by OSHA in which maintenance and other activities result in employee exposures to asbestos. The two standards contain a number of new requirements and changes from the previous standard which will require immediate action to comply. Both standards establish a new Permissible Exposure Limit of 0.2 fibers/cc and a new Action Level of 0.1 fibers/cc. The standards include new requirements on employee exposure monitoring, regulated areas, special work procedures, engineering controls, and training. In addition, most of the program requirements under the previous standard have been expanded, e.g., respiratory protection, medical surveillance, hygiene facilities, and lunchrooms.

The Guideline and copies of the standards are being sent under separate cover to all Safety, Fire and Health compliance contacts. If additional copies of the information package are required, please contact Ms. Leigh Ann Rovnanik at CTN 894-6917.



R. L. ARSCOTT

JSH:oja
Attachments

cc: SF&H Contacts
Mr. P. R. Gates
R. E. Swencicki, M.D.

ASBESTOS COMPLIANCE GUIDELINE

INTRODUCTION

This Guideline provides guidance and interpretation for Chevron facilities on how to comply with the two new OSHA asbestos standards; 1926.58 for Construction and 1910.1001 for General Industry. This guide consists of three parts. Part I presents an overall approach for applying these standards to Chevron facilities and a summary of the requirements. Part II contains a detailed outline of both standards with side by side interpretation of important sections. Part III describes how Chevron facilities should apply the standards to contractors.

PART I IMPLEMENTATION APPROACH

SCOPE

FED-OSHA GENERAL INDUSTRY ASBESTOS STANDARD: This standard applies to all asbestos exposures not covered by the Asbestos Construction Standard. The standard applies to asbestos exposures which occur as a result of normal routine ongoing day-to-day maintenance and operations activities at Chevron facilities, generally involving no more than 5-6 man-days of work per job. The General Industry Standard applies to work performed by Chevron personnel and to work performed by full time, on-site contractors (see Part III). Some examples of activities covered by this standard are as follows:

- Normal maintenance on pipes, valves, pumps or other equipment which requires removing asbestos insulation in order to gain access to the equipment. These activities are covered by the General Industry Standard as long as they are part of an ongoing maintenance program (i.e., they are not part of a large one time special project).
- Replacing, or removing asbestos containing products as part of the periodic maintenance of the equipment, e.g., replacing asbestos gaskets, seals, and packing in pipes, pumps or valves; and replacing asbestos brakes and clutches in vehicles. These would fall under the standard regardless of the number of these jobs performed each month.
- Replacing deteriorating asbestos insulation on pipe, vessels or other structures. These jobs are covered by this standard if they are part of a regular ongoing program of maintaining insulation on pipes, vessels etc. and each job involves no more than 5-6 man-days of work.
- Normal ongoing building maintenance activities which result in asbestos exposure (including moving light fixtures, installing telephone or computer cables above the ceiling, work on ventilation systems above the ceiling and installing hangers for light fixtures) that are part of the normal maintenance for the building and involve no more than 5-6 man-days of work per job.

FED-OSHA CONSTRUCTION ASBESTOS STANDARD: This standard applies to asbestos exposures which occur as a result of major non-routine special construction/maintenance projects at Chevron facilities which involve more than 6 man-days of work and fall outside the normal day-to-day maintenance activities. The Construction Standard covers these projects when they are performed by specially hired outside contractors for Chevron and when they are performed by a special task group of Chevron employees. Examples of jobs covered by this standard are as follows:

- A large special project to replace asbestos insulation on a series of pipes requiring more than 5-6 man days. This may often be done as part of a shut down of a particular plant.
- A project to dismantle a vessel, tower or other structure which results in asbestos exposure as a part of the job.
- Renovation activities in a building which consist of more than 6 man-days of work and result in asbestos exposure. These jobs would usually involve more than one type of activity and may involve evacuating part or all of a floor to perform the work.
- A special one-time repair or maintenance project of a structure which results in asbestos exposure of employees. The Construction Standard would apply to all activities during the project which result in asbestos exposure including cleanup and disposal of asbestos containing wastes and scraps.

GENERAL REQUIREMENTS

The following outline indicates the various general requirements under both standards which must be met if exposures exceed the action level of 0.1 fibers/cc, if exposures exceed the PEL of 0.2 fibers/cc, or for all exposure levels.

Exposures Exceeding 0.2 Fibers/cc as an 8-Hr. TWA

- Establish regulated areas
- Compliance methods must be used to reduce exposures
- Establish respirator program to supplement other controls
- Use protective clothing
- Provide hygiene facilities
- Post signs
- Construction Standard Only: Communication with other employees on site
- General Industry Standard Only: Establish written compliance program
- Plus all requirements listed in the two sections below

Exposures Exceeding 0.1 Fibers/cc as an 8-Hr. TWA

- Medical surveillance: for employees exposed at least 30 days or more/year under the Construction Standard; no minimum frequency for the

- General Industry Standard
- Training
- Followup monitoring
- Plus all requirements listed in the section below

All Exposures Levels (including exposures below the action level)

- Exposure monitoring
- Housekeeping and waste disposal
- Recordkeeping
- Employee access to records
- Employee notification of monitoring results
- Use warning labels on containers

COMPLIANCE DATES

The two standards have the schedule of compliance dates outlined below. These dates represent the deadlines for meeting the various parts of the standards.

Construction standard:	All requirements - January 16, 1987
General Industry:	July 20, 1986 for all parts (including the PEL) except the following:
Exposure monitoring:	October 20, 1986
Training	October 20, 1986
Respiratory Protection:	July 21, 1986 if exposures are above 2 fibers/cc
	November 17, 1986 if exposures are above 0.2 fibers/cc
	January 16, 1987 - powered air purifying respirators must be provided upon request
Regulated areas:	November 17, 1986
Medical surveillance:	November 17, 1986
Hygiene and Lunchroom:	January 16, 1987 - construction plans
	July 20, 1987 - construction finished
Compliance Program:	July 20, 1987
Methods of Compliance:	July 20, 1988

SPECIFIC REQUIREMENTS FOR REGULATED AREAS

The two new asbestos standards require that regulated areas be established when asbestos exposures occur under certain conditions. By definition in the standards, there are two types of regulated areas.

- I. The first type of regulated area is required under both the General Industry and the Construction Standard for any work area where employee exposures are likely to exceed the PEL. The requirements for this type of regulated area are as follows:
 - a. Demarcate the area and restrict access
 - b. Prevent eating, drinking, smoking, chewing inside the area

- c. Use respiratory protection in the area
 - d. Post warning signs in the area
 - e. Hygiene facilities and practices are required for the area
2. The second type of regulated area is required only under the Construction Standard for any area where asbestos removal, renovation, or demolition occurs (including asbestos insulation). The requirements for this type of regulated area are as follows:
- a. Use negative pressure enclosures whenever feasible
 - b. Designate a "competent" person to oversee the job
 - c. Establish a decontamination area - clean room, shower area and equipment room with entry and exit procedures

Exception The three requirements indicated above for this second type of regulated area are not required for "short-duration, small jobs". As a guideline, a short-duration, small job is an activity that meets the following criteria:

- It can be performed in a day or less involving only 1-3 employees.
- The activity is performed as part of a major non-routine special project covered by the Construction Standard.
- The exposures can be controlled to below the Action Level using glove bags, wet techniques, and other methods.

Examples of short-duration, small jobs given by OSHA are pipe repair, valve replacement, installing electrical conduit and other general building maintenance activities. It is not acceptable to divide a job lasting more than one day into a series of 1 day short-duration small jobs to avoid the three requirements above. Monitoring should be performed to document that exposures are below the action level.

Negative pressure enclosures are physical constructions enclosing a regulated area (e.g., out of plastic sheet) in which a negative pressure can be created by means of mechanical ventilation. The following approach can be used as a guideline for deciding if a negative pressure enclosure is feasible. If it is difficult to set up a negative pressure enclosure due to other structures or equipment present which prevent sufficient room for an enclosure, and a glove bag, wet techniques and other controls can be used, to control exposures to below the PEL, it can be considered infeasible. Asbestos removal inside of a building, or enclosed area would usually be an application in which a negative pressure enclosure is feasible. If a negative pressure enclosure is determined to be infeasible for a particular activity, exposure monitoring should be performed downwind of the regulated area (e.g., area samples) during the activity to document that levels downwind were below the action level. Personal exposure monitoring should be performed within the regulated area to document that exposures are below the PEL.

In addition to the above, the second type of regulated area also requires the following. These are required for short-duration small jobs.

- d. Post warning signs in the area
- e. Hygiene facilities and practices are required for the area.

DOCUMENTATION

As part of a compliance program for these two standards, Chevron facilities should document which of the two standards applies for each activity involving asbestos exposure. This could be done by simply noting on the work order the applicable standard. Alternatively a log or other record could be kept of the jobs involving asbestos exposure and the applicable standard. The purpose of this documentation is to show that the compliance program is consistent and appropriate. This Asbestos Compliance Guideline is intended to provide the overall Chevron rationale for compliance with the two standards.

INITIAL MONITORING

Chevron facilities must develop a set of initial monitoring data for activities involving asbestos exposure in order to comply with each of the two standards and to be used for the following:

- To determine which parts of the standard apply.
- To determine if additional monitoring is needed.
- To support the decisions made regarding the use of work practices, respiratory protection and other controls in the standards.
- To document employee exposure levels for the activities.

The data must be sufficient to represent all employee exposures associated with each activity involving asbestos exposure. Corporate Industrial Hygiene will assemble monitoring results from Chevron facilities to develop a set of data on exposure levels associated with specific activities. A copy of initial monitoring results obtained should be sent to Mr. J. S. Hatfield of Corporate Industrial Hygiene.

Previous personal asbestos monitoring results can be used to meet the initial monitoring requirement for the General Industry Standard only if the results were collected after December 20, 1985 for similar activities. Previous personal monitoring results can be used to meet the initial monitoring requirement for the Construction Standard if the monitoring results were obtained for activities similar to those in question (e.g., the data is within the last 3 years and the job, work conditions, procedures and controls are similar). If previous monitoring results are not adequate, exposure monitoring must be performed. After the initial monitoring data has been collected, additional monitoring may be needed depending on the exposure levels. For the General Industry Standard, followup monitoring is needed at least every 6 months for all exposures exceeding the action level. The Construction Standard requires daily monitoring except for those exposures shown to be consistently below the action level or for employees using supplied air positive pressure respirators.