FILE NAME: Goodyear (GY)

DATE: 1976 Dec 6

DOC#: GY043

DOCUMENT DESCRIPTION: Memo RE Use of Asbestos - OSHA Standard 1910.93a & Disposal of Asbestos Waste - EPA Standard

PLANT MANAGER
GOODYEAR PLANT
DECATUR AL

Parish
Tuttle
Kelly
Adams

December 6, 1976

Memorandum

(I) Use of Asbestos - (OSHA Standard 1910.93a)
(II) Disposal of Asbestos Waste (EPA Standard - 40 CFR - 61)

(I) OSHA

Asbestos fibers in the atmosphere have been determined to be a health hazard at concentrations exceeding an 8-hour time-weighted average of 2 fibers (longer than 5 micrometers) per cubic centimeter of tar. Under Section 1910.93a (f) Monitoring, every employer, "where asbestos fibers are released," must undertake a monitoring-medical surveillance program of considerable expense and duration.

It is important that plants not manufacturing asbestos type products avoid being classified as an employer "where asbestos fibers are released" thus avoiding the necessity for implementing a program for monitorning air borne concentrations of asbestos fibers and subsequent medical surveillance of personnel so exposed.

Each facility where asbestos type products may now be incidentally used (i.e., thermal piping insulation, exposed insulating cover for tire builders' hot knift receptacles, etc) is to immediately avoid the obvious use of same. This includes the purchase of equipment incorporating exposed fibrous asbestos components subject to operating damage resulting in possible release of airborne fibers.

An area of particular concern relates to the need for implementing the proper procedures when removing and disposing of asbestos insulation. Herebelow is the proper procedure for handling asbestos as recommended by The Corporate Engineering and Safety Departments.

A. Issuance and distribution of an in-plant Safety Standard Practice Letter Containing the following information:

Reference: Removing, repairing, and handling asbestos insulation.

When it becomes necessary to repair or remove asbestos insulation, the insulation personnel must follow the procedure, herebelow:

1. Notify supervision
2. Rope off (barricade) the areas that could be contaminated by airborne asbestos fibers.
3. Clear the area of all unnecessary employees
4. Around barricaded areas, place warning signs reading:

CAUTION

ASBESTOS DUST HAZARD
AVOID BREATHING DUST
WEAR ASSIGNED PROTECTIVE EQUIPMENT
DO NOT REMAIN IN AREA UNLESS
YOUR WORK REQUIRES IT
BREATHING ASBESTOS DUST MAY BE HAZARDOUS
TO YOUR HEALTH!

5. All employees required to work in the affected area shall wear an approved respirator.

6. If insulation is to be removed or work in such a way that fibers may become airborne, the insulation shall be thoroughly wet down.

7. For all repair work, non-asbestos type insulation is to be applied.

8. When each job is complete or at the end of each work shift, whichever comes first, all material that has been removed shall be picked up and placed in an impermeable bag and sealed.

*9. Material is to be disposed of in accordance with the procedures outlined in Section II.

*10. When job is finished or at end of work shift, clothing shall be placed in an impermeable bag and sealed. Bag shall have the appropriate label applied after which it shall be sent out for laudering.

*Warning sign or label to read:

CAUTION

CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSE
SERIOUS BODILY HARM

_____

_____ Signatures of appropriate management personnel

_____

_____

B. When a contractor may be required to handle asbestos insulation the same general handling procedures as above shall be made a part of the general conditions and further reinforced at the start of the job.

Please be advised that Corporate Engineering has revised Specification #.31810 (Pipe Insulation for Steam and Hot Water Piping). It is available upon request. A market survey is being undertaken in an effort to find a satisfactory, economic replacement for asbestos sheet type flange gasketing.

II. EPA's Hazardous Air Pollutants - Asbestos (40 CFR-61)

A. Demolition and Renovation

1. Notification

Notification must be sent to the EPA 20 days prior to demolishing or renovating any facility that has a significant amount of friable asbestos material (260 linear feet of pipe insulation or 160 square feet of insulation; e.g., on reactors or boilers).

Environmental Engineering should be consulted prior to notifying the EPA.

2. Procedures to be used during demolition or renovation:

Details are given in section 61.22 (d)(4). These procedures should be followed whether or not the work requires notifying the EPA.

B. Disposal

The procedure outlined in Section 61.22 (j)(3)(i) should be followed.

This section provides an acceptable disposal procedure which includes wetting down any asbestos wastes and sealing them in a leak tight container for disposal in an approved sanitary landfill.

Section 61.25 gives the criteria for the operation of a landfill site. Assurances should be obtained from the plant's waste contractor that the material is disposed of in the proper manner.

R G Cummings, Manager
Corporate Safety

E J Burkett, Manager
Corporate Environmental
Engineering

jlc

December 6, 1976

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GY01-002664

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R G Cummings, Manager
Corporate Safety

E J Burkett, Manager
Corporate Environmental Engineering

jlc

AUG 15 1990
W. E. B.

GLD 001160

Mailing List

Plant	Manager Engineering	Plant Manager	Safety Manager	
Danville	B M Cox	H M Hood	J Garver	cc: F Prus
Gadsden	J L Roberts	S J Mihelick	J Burton	F Tully
Jackson, Michigan	R J Riedel	P W Rowberg	P Meier	T Leary
Lincoln	R J Dingledine	D R Remigio	D Hart	R Cummings
Logan	J D Fisher	J C Butcher	W McAfooes	D Salzer
Los Angeles	W A Bailey	J R Borgerding	R Solem	E Moats
Luckey	D R Erslan	C F Josvanger	R Henkener	C Johnson
New Bedford	K F Gillum	G F Johnson	F Byers	R Modrell
St Marys	O J Mallamaci	J E Holaday	R Ballenger	[redacted]
North Chicago	R A Warner	J F Wolf	E LaBreque	G DiCaudo
Topeka	R L Humphreys	J B Row	J M Boggs	T Ito
Union City	K L Schneider	R A Davies	B Long	D Martin
Windsor	C D Crosby	J F Floyd	W Boutilier	W L Cox
K/S Cumberland	R C Beaman	K R Feise	C Norris	W Davis
K/S Fayetteville	D Stryk	W E Spiegelberg	C B Malley	D Towle
K/S Freeport	P L Ruble	D E Lilya	D E Clock	(GAC)
K/S Tyler	W G Barger	W R Schultz	E R Jackson	
Lee	J McDowell	G D Seas	J J Barbiers	
Houston	W A Inkofer	B A Rosinski	B Bittner	
Beaumont	J K Boughton	H R Sontag	W A Thomas	
Niagara Falls	R H Evans	J M Gilmore	H Clark	
Pt Pleasant	J W Coonen	M T Bucci	F Edelmann	
Plaquemine	J O Carver	F A Cox		
Scottsboro	C D McLelland	R G Nichols	H Rudder	
Madisonville	R E Wagner	H L McLeod	L Zirko	
Marysville	W A Prazak	G L Cormany	R Keating	
Cartersville	H C Haigler	G R Bethune	W Irby	
Cedartown	G V Hightower	R E Machan		
Decatur	R L Pirtle	A L Stube		
Rockmart	J P Bowers	F M Herndon		
Bakersfield	R J Wade	E C Snyder	J McColgan	
Calhoun		E W Campbell		
Ashland		W R Schmitz	D Stevic	
Merced	R P Nicodemus	J L Persinger		
Bayport	W E Schoppa	J A Pearson	M McGrann	
Akron Plant I	L Taylor	R A Beahn (Supt)	D L Grayem	
Akron Plant II Tires	W A Green	W Birdwell	F Thompson	
Akron Plant II IRP	W F Culp	T J Cox		
Akron Plant C	G A Kaut	S E Aylies	J R Hemminger	
Akron Rim Plant	B V Adams	J D Petersen	J R Hemminger	
Akron Chemigum	A D Taylor	R C Stell	D J Mariani	
Akron Chemical	C B Jones	O Carlson	D L Grayem	
Jackson, Ohio	W L Hewitt	C M Hutchings		
Sun Prairie	R A Warner	H Beckman (Supt)		
Stow		W J Gron		
Akron Plant B Vinyl	R L Hively	S E Aylies		
Chehalis		G A Simmons		
Reneer Films	J Madenfort	D E Harrington		
Motor Wheel Corp	E Weller	J Golata (Vice-Pres)	D Gleghorn	
GAC-Akron	D E Hill (VP)	R M Patterson (Plt Engr)	P J Brown	
GAC-Arizona Litchifield Park	G Phillips	L Laden	W Sherman	
Berea		L J Turner		

GLD 001157

Note: Talked to Burkett to get insulation spec. along with this (he forgot). I gave him 100 copies. JLW - 1/6/77