

ETHYL CORPORATION

INTER-OFFICE

PLAINTIFF'S EXHIBIT

ETCO-569

To C.J. Lowe Address Pasadena
From Donald E. Johnson Address BRT
SUBJECT Asbestos Removal, Central Shops Ceiling DATE Feb. 2, 1979

R.P. Love has asked for comments on the written protocol for asbestos coating removal from the central shops ceiling. (See attached).

The recommendations look excellent to me. It is a highly commendable effort to meet the regulations and still get a difficult job done. Your people obviously have put a lot of effort into preparing to handle the job correctly.

The industrial hygiene group will provide the required support. Please, give us as much advance notice as feasible so we can arrange prompt analysis of monitoring samples.


Donald E. Johnson

DEJ:sbb

cc: W. Armstrong/A.O. Wikman

J.G. Burdick/G.B. Meyers

R. Herzog

C.B. Hunt

R.P. Love

G.L. Ter Haar

J.T. Rucker/P.J. Sanders

File:Oper.Houston (Monitoring)

ETH 002367

Don,

For your comments.

ASBESTOS REMOVAL CENTRAL SHOPS CEILING PROJECT

*Review as to whether
it's right, this is a highly
commendable approach*

JAN 30 1974

GENERAL DESCRIPTION

The project involves the safe removal of a ceiling coating sprayed to portions of the underside of the Houston Plant Central Shops Building. The material has been determined to contain 45% friable chrysotile (asbestos), sprayed onto concrete blocks and thus removal falls under jurisdiction of numerous governmental authorities.

GOVERNMENTAL REGULATIONS

All regulations governing asbestos handling which have been issued by proper governmental authorities shall be strictly adhered to. The singling out of particular rules should not be construed to mean that our concurrence would be given for disregarding other applicable rules and regulations. The following are regulations of particular importance. OSHA Standards and Interpretations 1910.1001 (herein referred to as OSHA 1910.1001) and the Environmental Protection Agency Regulations on National Emission Standards for hazardous air pollutants part 61 sub-parts A&B (herein referred to as EPA 61 A&B).

PROJECT SCOPE

The locations where removal will be required is a 160' x 160' (approximately 25,000 sq. ft.) area with ceilings approximately 35' in height. The area is roughly covered by the aluminum nozzle rebuilding shop to the SW, the blacksmith to the SE, the Electrical Foreman's office to the NE, and the Electrical Shop to the NW. The asbestos material varies in thickness, but on the average is 3/4" thick. The total volume of asbestos (before crushing or wetting) should not exceed 60 cubic yards.

GENERAL JOB REGULATIONS

Due to the nature of the project and the critical need to try to maintain normal operations in the shops area, working hours for this project

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GENERAL JOB REGULATIONS - continued.

would run between 4:30 p.m. and 6 a.m., except for the weekend when it may run from 4:30 p.m. Friday to 6:00 a.m. Monday with the first day of actual asbestos removal to commence on Friday afternoon. It is expected that the job will be stopped soon enough to provide adequate time for through clean-up of all waste from work areas.

It may be necessary to stop the cleaning operation at any time so work can be accomplished in the Shops by Ethyl personnel. Access to the jobsite will be carefully restricted.

Compliance is expected for OSHA 1910.1001 (d) (3-4), however Ethyl Corporation will not allow access or use of company clothes, sanitary facilities, eating facilities, or change lockers. Space will be provided as required for portable buildings to provide these services.

In general, personnel not involved in removal will not be permitted in the Shops area, and personnel involved in this project will be restricted to the jobsite and the portable buildings supplied for their use. Anyone entering the building during removal will wear disposable overalls and respirators and clothes changes will be required before and after each work period.

AIR QUALITY AND CONTROL.

Every effort shall be made to limit the amount of air space where airborne concentration of asbestos exceed the permissible level as stated in OSHA 1910.1001 (b). Where these levels may be exceeded supplied air respirators will be provided in accordance with OSHA 1910.1001 (d) (1-2). Air for this system will be supplied by Ethyl Corporation, except where portable equipment is required. This will be provided by the contractor.

It is understood that until monitoring should show otherwise, personnel in the immediate vicinity or directly below the removal area will wear

AIR QUALITY AND CONTROL - continued

supplied air respirators. Necessary standby will be provided to insure the safety of these personnel.

Ventilation systems which limit air concentrations will be used whenever possible. Particular attention should be given to OSHA 1910.1001 (c) (ii) (a) and EPA 61.23 to assure that ventilation exhaust are properly filtered. All ventilation and filter systems will be supplied by the contractor, but must be approved by Ethyl Corporation. The location of these systems on plant property will be restricted to those areas approved by Ethyl Corporation.

The contractor is expected to comply with OSHA 1910.1001 (f) (monitoring) for protection of it's own employees.

REMOVAL

Consideration should be given to the method of removal and the method of surrounding area protection, with procedures made known to and approved by Ethyl.

The contractor shall see that all tools directly used for the removal of asbestos from the ceiling shall be ventilated in compliance with OSHA 1910.1001 (c) (i) (iii). Per OSHA 1910.1001 (c) (2) and EPA 61.22 (D) (4) (iii) (D) (4) (vi) removal shall be in a wet state or accomplished by wetting or ventilating (vacuum system).

SIGNS

The contractor is further responsible for the proper procurement, placement, removal, and storage of the proper signs and caution labels as specified by OSHA 1910.1001 (g), and directed by Ethyl.

It must be highly emphasized that all containers (drums, bags, cans, truck tanks, and enclosures) where scraps are held and all areas where excessive concentrations may be located (inside the building, at doors, around

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REMOVAL - continued

ventilation exhausts) are to be so designated per the above section.

DISPOSAL AND NOTICE

The particular method of disposal of waste asbestos shall be made known to Ethyl Corporation, from removal, to containment, to disposal.

The disposal site shall meet the regulations as governed by EPA 61.25.

This information shall be made known to Ethyl 30 days prior to beginning the job for forwarding to the EPA. The asbestos is to remain in the wet state during all handling steps thru disposal.

Trip tickets to the disposal site will be provided by the contractor to Ethyl.

BID INFORMATION

Your bid for this should address the following:

- A. Time per unit area
- B. Price per unit area and/or per man-hours.
- C. Equipment costs.
- D. Manpower and job time projections.
- F. All pertinent work methods.
- G. A written statement to the effect that you are aware of all aforementioned government regulations.

A. A. Navarre
November 28, 1978

ETH 002371

Final
Blair
Ruck
Wade
Sanders
Wardell
Van