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TO E. T. Gellenbeck

DATE March 4, 1975

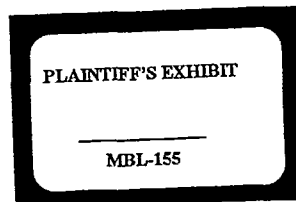
C. C. R. P. Medlin
 E. D. Keiper
 E. W. Collins
 P. J. Reilly

ASBESTOS HANDLING REQUIREMENTS

Attached are 50 copies of the "Asbestos Handling Requirements" for distribution and use within the refinery. This final draft has incorporated the comments of Operations and Engineering where possible. Employee Relations will develop an extract for inclusion in the Supervisor's Handbook.

J. L. Wescoat
 J. L. Wescoat

RWmasters:eh
 Attachments



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MAR 4 1975

ASBESTOS HANDLING REQUIREMENTS

INTRODUCTION

Based on the rules and regulations promulgated under OSHA and by the EPA, all handling of asbestos bearing material requires special attention. This guide is intended to provide process and mechanical supervisors with a summary of the actions which must be taken when employees are working in an area where asbestos bearing insulation is being removed and handled.

COVERAGE

As of August 29, 1972, the Purchasing Department was instructed that all future purchases of insulating material must be asbestos free. It is difficult to differentiate, by appearance, between asbestos bearing and asbestos free insulation. To establish a guideline, friable insulating materials installed prior to January 1, 1973 will be considered to contain asbestos fibers and will be treated according to the following requirements. If the material can be positively identified as being asbestos free, the full requirements which follow need not apply.

The following list indicates those items which contain asbestos that are not considered to present a health hazard. These items are approved for use in the refinery without special handling precautions:

- Woven asbestos covered thermocouple lead wires
- Solid sheet asbestos gaskets
- Spiral wound asbestos packed gaskets
- Asbestos gloves
- Asbestos welding blankets
- Graphite or teflon impregnated woven asbestos packing

Any asbestos bearing materials, presently on hand or contemplated for purchase, that is not in the above list must be reviewed with a representative of the Safety Department and the Industrial Hygiene Department to determine if its use would require any special personal protective measures.

REQUIREMENTS

The following requirements are based on OSHA and EPA rules and upon

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three Industrial Hygiene Investigations conducted in the Beaumont and Paulsboro Refineries. They are intended to cover routine jobs where old insulation is removed; large jobs where demolition is involved may require additional precautions.

- 1.a. The plant representative involved in a job which will require the removal of asbestos bearing thermal insulation must notify a Safety Department Foreman to inform him of the nature of the intended work.
- b. Where small areas are removed for inspection of base metal, e.g. Sonoray, the method of removal is important. If the method of removal may generate significant airborne fibers, the precautions which follow must be observed. The worker cutting the area for inspection must wear an air purifying respirator regardless of the method of removal.
2. The plant representative must obtain sufficient respirators, caution signs, caution tags (see figure 1), heavy plastic bags, and safety tape to complete the job in accordance with the following requirements. These items are available from the Safety Storeroom.
3. Asbestos bearing material is best handled in a wet condition. It must be wetted to keep moist during the removal and handling period whenever possible.
4. In congested areas and in process units a safety tape barrier shall be installed to isolate the area where insulation is being removed. It is recommended that the safety tape be located 25 feet from the work area. Tape barriers are not required when small groups are working in isolated areas where other personnel are not likely to become involved.
5. All workers inside the area marked by safety tape must wear air purifying respirators as well as those workers actually handling the material. Respirators must be worn regardless of barricade or wetting practice.
6. Caution signs must be posted at all approaches to the area.

in which asbestos type insulation is being handled.

7. Employees who, according to a medical examination, cannot function normally with a respirator device shall not be assigned to work requiring a respirator.
8. All removed insulation shall be carefully placed in the plastic bags available from the Safety Department. When full, the bags shall be sealed and the caution tags attached in a readily visible location.
9. Piping and other equipment covered with asbestos insulation must not be dropped or thrown from buildings or structures. It should be carefully lowered to the ground. When jacketing has been removed from piping the insulation must be wetted before lowering.
10. The EPA must be notified at least 20 days before starting "demolition" work on asbestos covered piping and equipment. Routine maintenance and repair work is not to be considered as demolition and does not require notification. Examples of demolition which would require EPA notification are: Demolition of TCC-1, or major physical changes of a structure which bears asbestos insulation. The unit responsible for initiating demolition work must contact the Conservation Engineering Section at least 30 days before demolition activities are initiated so that they may forward the required notification to the EPA.
11. Sealed containers of asbestos scrap may be taken to the sanitary land fill area where it is buried. A plant representative must notify the Conservation Engineering Section before having the scrap hauled to the land fill area.
12. On jobs performed by contractors, it is the contractor's responsibility to conduct the job in accordance with the OSHA and EPA rules and regulations. The Mobil Contact or Construction Inspector should insure that the contractor is aware of his obligations to conform with these regulations. The contractor will provide his own signs, tags, bags, and barricade tape, etc.

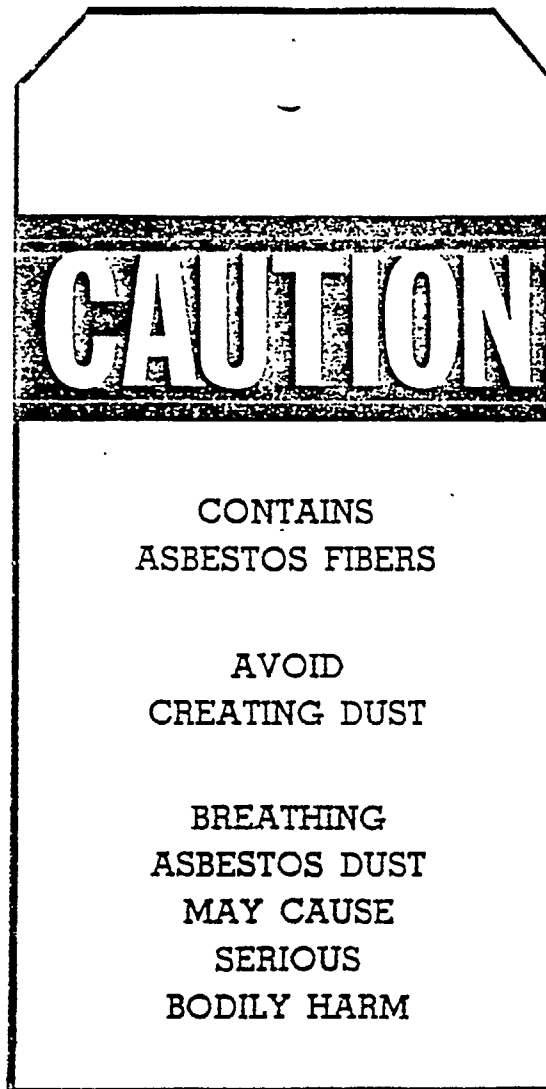


FIGURE 1.

HANDLING ASBESTOS-CONTAINING MATERIAL

March 4, 1975
Revised November 11, 1985

INTRODUCTION

This procedure is intended to provide guidelines for the safe handling of asbestos and/or asbestos-containing materials so that personnel involved in the handling operation or in the area of the work will not be exposed to asbestos fibers.

MATERIAL IDENTIFICATION

Insulating material and other suspected asbestos-containing materials (transite siding, etc.) being removed should be considered as containing asbestos fibers unless:

- a. All of the material in question has specific manufacturer's marking denoting that it is "asbestos free," or
- b. Engineering drawings or other signed and dated documents verify that equipment is covered with "asbestos free" material (only 1972 and later installations will be acceptable under this item), or
- c. Qualitative analysis of at least 2 samples of the material confirms it is "asbestos free." These analyses must be recorded on signed documents.

Material must not be reinstalled unless proven to be asbestos-free by one of the above methods.

MATERIAL ANALYSIS

Bulk samples of insulation should be placed in a sealed plastic bag and tagged to indicate: date, location.

The requestor should fill out the Asbestos Sample Data Sheet (copy attached) and bring it to the Industrial Hygiene Office.

A qualitative test will be conducted, documented and signed. The results will be given as "positive" or "negative."

When requesting analysis, the following should be observed:

- a. For scheduled projects, submit samples at least four (4) days in advance.
- b. For unscheduled/emergency projects, the bulk samples should be submitted at least three (3) hours in advance.

HANDLING ASBESTOS-CONTAINING MATERIAL (cont'd)**APPROVED ASBESTOS-CONTAINING MATERIALS**

The following asbestos-containing items are approved for use in the refinery without special handling precautions:

- . Woven asbestos-covered thermocouple lead wires
- . Solid sheet asbestos gaskets
- . Spiral-wound asbestos-packed gaskets
- . Asbestos gloves
- . Asbestos welding blankets
- . Graphite- or teflon-impregnated woven asbestos packing

Any asbestos-bearing materials presently on hand or contemplated for purchase that are not in the above list must be reviewed with a representative of the Safety Department to determine: (1) if they are permissible and/or (2) if their use would require any special personal protective measures.

TRAINING

Personnel involved in the handling of asbestos-containing materials must be trained in:

- a. The potential health hazards of asbestos fibers.
- b. The procedure for safely handling asbestos-containing materials.
- c. The proper use and limitations of respirators.

JOB REQUIREMENTS

Following are the requirements for all jobs where asbestos-containing material is removed (large demolition jobs may require additional precautions):

1. The job supervisor will arrange for sufficient respirators, protective clothing, caution signs, caution tags, heavy plastic bags, and barrier tape to complete the job in accordance with the following requirements. These items are available from the Safety Storeroom.
2. A safety tape barrier shall be installed to isolate the area where material is being removed. The tape should encircle approximately a 50-foot radius around the work site. Signs shall be installed on this barrier to alert personnel to a potential exposure to asbestos.

The signs will read:

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

HANDLING ASBESTOS-CONTAINING MATERIAL (cont'd)

3. Any person who enters the safety tape barrier area must wear a NIOSH-approved dust respirator as a minimum precaution. Temporary or summer-hire employees should not be assigned to work inside this barrier.
4. Employees involved in the removal operation must be equipped with a NIOSH-approved, single use, disposable dust respirator. Employees also must wear gloves, coveralls, shoe covers, and a head covering over hard hats. Gloves, coveralls, shoe covers, and head covers should be of the single-use, disposable type. The clothing must be removed and placed in the approved disposal bags before eating and before leaving the work area for any reason. The dust respirator should be removed last and placed in this bag also.
5. All asbestos-containing materials must be thoroughly wetted with water before removal to prevent dust dispersion. It should be wetted initially and kept wet during the entire removal and handling operation.

In extraordinary cases, where wetting is not possible, an alternate procedure may be developed by the job supervisor, the proprietor and the Safety Foreman.

6. A suitable and effective means of containment, such as a disposable plastic sheet placed under and/or around the work area, should be used to prevent the dispersion and ground settling of fibers so that their subsequent release to the atmosphere in a dry form does not occur. This plastic sheet should also be placed in an approved disposal bag at the end of each work period.
7. Asbestos-containing material should be handled carefully so as not to disperse fibers into the air. Materials should not be dropped or thrown down.
8. Piping and other equipment covered with asbestos-containing material must not be dropped or thrown from buildings or structures. It should be carefully lowered to the ground. When jacketing has been removed from piping, the insulation must be wetted before lowering.
9. Where power tools such as abrasive wheels, drills, etc., are being used to remove insulation, all such tools must be provided with local exhaust ventilation to capture asbestos dust as it is generated.

HANDLING ASBESTOS-CONTAINING MATERIAL (cont'd)

10. Waste asbestos-containing material and other debris must immediately be placed in approved disposal bags, sealed and affixed with cautionary tags. Broken or torn bags must be double-bagged to prevent leakage. The cautionary tag will read:

CAUTION

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust May Cause Serious Bodily Harm

11. Upon completion of the work each day, the work area shall be completely cleaned of asbestos to minimize potential exposure, including flushing with water, vacuuming or other appropriate means.
12. The bagged waste material is to be removed daily from the work area and deposited in the identified asbestos disposal container located near the refinery landfill. Disposal of waste asbestos-containing material is not permitted in the refinery landfill. All such waste is disposed of off-site at an approved waste disposal facility.
13. Asbestos- and non-asbestos-containing materials must be disposed of in accordance with the Dumpground Solid Waste Disposal Procedure. This procedure basically requires that a Refinery Landfill Ticket, BR-1172, be provided to the truck driver for presentation to the guard at the dumpground for each load of waste. The individual authorizing the ticket is responsible for ensuring that documentation of material identification, as specified on page 1 of this procedure, is readily available and can be provided upon request.
14. Bags must be handled, transported, and placed in the disposal container carefully to prevent bag rupture. Broken or torn bags must be immediately rebagged by the disposer. Broken bags constitute a potential asbestos exposure requiring the same personnel protective equipment designated in item 4, page 2, until rebagging is completed.

TRANSITE

Transite may contain up to 40% asbestos, and must be treated as an asbestos-containing material in accordance with the above job requirements. However, if it can be removed without sawing, drilling or otherwise creating dust, the following exceptions are permitted:

1. Where plastic sheeting can be used to isolate removal operations from other building operations, such as during the removal of exterior wall panels, the 50-foot perimeter may be reduced on the building occupant side.

HANDLING ASBESTOS-CONTAINING MATERIAL (cont'd)

2. A dedicated dumpster, with doors or hatches to provide complete enclosure, may be used instead of individual plastic bags. Transit panels must be carefully placed, intact, in the dumpster as they are removed from the structure. If necessary to reduce the size of panels to fit into the dumpster, the panels can be laid on plastic sheeting on the ground, wetted, and broken to proper size.

DEMOLITION AND RENOVATION

The Texas Air Control Board (TACB) must be notified in writing prior to initiating work involving asbestos removal as follows:

1. The plant proprietor responsible for initiating work involving asbestos removal must advise the Conservation Section of the magnitude and type (demolition or renovation) of work as soon as possible or preferably 30 days prior to commencement of the activity. This will allow time to review the need for notification and, when necessary, to work with contractor representatives to insure that the necessary TACB notifications have been submitted.
2. For contracted asbestos renovation or demolition, it is the contractor's responsibility to make the required notifications. The contractor must be able to provide documentation that notification has been made upon request by a Mobil representative. For work performed by Mobil, the Conservation Section will make any required notifications.
3. For any asbestos removal that involves the wrecking or removal of any load-supporting structural member (demolition), a written notification is required as follows:
 - a. For scheduled projects where the amount of asbestos is at least 260 linear feet or at least 160 square feet, notify at least 10 days before demolition.
 - b. For scheduled projects where the amount of asbestos is less than 260 linear feet or less than 160 square feet, notify at least 20 days before demolition.
 - c. For projects being demolished under an order of a state or local governmental agency, notify as early as possible before demolition.

HANDLING ASBESTOS-CONTAINING MATERIAL (continued)

4. For asbestos removal that involves the altering (renovation) of a facility component (any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member), but not demolition, a written notification is required as follows:
 - a. For individual non-scheduled projects over a period of one year where the total amount of asbestos is predicted to be at least 260 linear feet or at least 160 square feet, notify as early as possible before renovation.
 - b. For emergency renovation where the amount of asbestos is at least 260 linear feet or at least 160 square feet, notify as early as possible before renovation.

CONTRACT JOBS

On jobs performed by contractors, it is the contractor's responsibility to conduct the job in accordance with this procedure, except that the contractor will provide his own signs, tags, bags, plastic sheets, barricade tape, personal protective equipment, etc. The Mobil job representative will ensure that the contractor is aware of his obligation to conform with this procedure.

SBESTOS SAMPLE DATA SHEET
8/85

PWL		PWL-Sub		Date-YMD							
Sample No.		Result									
Sketch(f)											
						Submitted by(a)		Date(b)		Date Requested(c)	
						Plant/Unit(d)					
						Sample Location/Identifier Brief Description(e)					
						Magnesium		Iron		Asbestos ☐ Yes ☐ No	
+	-	+	-	Analysis by: Date:							
Princeton TSL: Yes/No Date: Results:											

Note: Persons(s) requesting analysis need to fill out columns (a) thru (f).

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INTEROFFICE CORRESPONDENCE

DATE September 10, 1973

TO J. L. Wescoat

C.C. R. D. Drew - New York
J. D. Reichel - New York
L. V. Cooley - Dallas
R. P. Madlin
E. D. Keiper
J. K. Stewart

J. L. WESCOAT

40 CFR 61 EPA REGULATIONS
HAZARDOUS AIR POLLUTANTS

Your September 7 letter transmitted an Asbestos Handling Guide in which Section 10 outlined certain requirements presumed to be encumbent upon the refinery in order to comply with the subject EPA regulation.

Specific reference is made to Section 61.22 (d) which sets forth notification requirements and procedures to be used under certain circumstances of demolition. The subsection applies to "Any owner or operator of a demolition operation"

Mr. Cooley of OGC - Dallas concurred in by Mr. Hewitt OGC - New York has rendered the opinion that the refinery does not constitute the owner or operator of a demolition operation. This regulation, therefore, does not apply to refinery activities and Section 10 of your Asbestos Handling Guide should be deleted.

The above is in reference only to the subject EPA regulation, and should not be used in any way affecting your implementation of any OSHA requirements deemed applicable.

E. T. GELLENBECK

R. G. Sanders, Jr.
By: R. G. Sanders, Jr.

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