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FROM R. E. Caldwell REF. NO. REC:87:101 DATE December 30, 1987

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SUBJECT: Insulation Removal Projects

Due to the age of the Shelby Plant, a considerable amount of insulation in place is asbestos. Generally, the insulation installed after 1974 is non-asbestos; however, there are some cases when this does not hold true. It is difficult to positively identify asbestos by visual inspection in many insulations due to the various forms of asbestos. The regulatory term "asbestos" and the regulations not only refer to asbestiform minerals, but to non-asbestiform minerals such as Tremolite, Actinolite and Anthodhyllite which were used in insulation materials also. Positive identification of questionable insulations can only be performed by microscopic examination.

The State's Air Quality Section and Department of Labor take a very active role in assuring compliance with the stringent asbestos regulations. Notifications for asbestos removal involving a specified amount must be submitted to the State Air Quality Section 10 days prior to beginning.

Due to the health risk associated with asbestos fibers and difficulty in determining asbestos content in insulation, the attached form should be submitted to the S.H.E. department two weeks prior to any planned insulation removal project. This will assure that an adequate assessment has been made in determining if the material contains asbestos and will allow sufficient time for regulatory notification in the event it is asbestos. In some insulation removal projects, the majority of the material may be non-asbestos with a small portion of piping, valving, mudding, or

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jointing sections being asbestos. In this case, any removal of this small amount of asbestos will constitute an asbestos project. Therefore, when planning an insulation removal project, all the different insulated components should be considered and not just the bulk of the removal project.

It is important that maintenance planners, contractors and project engineers are made aware of the asbestos removal requirements, as they can significantly impact cost estimates and timing.

Within the past two years several major insulation producers have begun incorporating a non-asbestos indicator into their product, such as black or gold flakes in the material. These indicator systems allow a positive non-asbestos identification by visually examining a piece of the insulation. I recommend that in all future purchases of insulation that such an indicator system be specified.



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