



To:

DISTRIBUTION

From:

Dick Wigger

Date:

May 12, 1981

Subject:

Asbestos Handling Procedure

The presence in the work environment of airborne asbestos can be a severe threat to worker health. We, therefore, must identify where asbestos is found in our operations (primarily in old insulation) and adhere to proper asbestos handling procedures. It is only in this way that we can control and prevent over exposure.

The effects of asbestos on health are not immediate and may not become apparent for many years after exposure. For this reason, materials containing asbestos should not be purchased or used if a suitable substitute exists.

The attached package has been prepared to consolidate the effect of OSHA and EPA regulations into a single Champion procedure on asbestos handling. This procedure covers routine maintenance efforts involving renovation where less than 260 linear feet of asbestos containing material is involved. For your use the following information is attached:

ASBESTOS HANDLING PROGRAM REQUIREMENTS

- ATTACHMENT A: Safety Practices for Short Term Work with Asbestos
B: Bulk Sampling Procedures for Asbestos
C: Supplies Recommended for Asbestos Work Procedure
D: Supplies Recommended for Asbestos Monitoring
E: OSHA Asbestos Standards 29 CFR 1910.1001

Dale Shapiro, our new Manager of Industrial Hygiene, is prepared to assist in the identification, monitoring and training aspects of the asbestos handling procedure. In addition, if major asbestos renovation (involving more than 259 linear feet of asbestos containing material is to take place, please contact Corporate Loss Prevention as procedures are available for these activities. If any questions arise or if further assistance is required, please contact Dale on Chamcon 227-6493.

Sincerely,

Dick Wigger

RCW:jl
attachments (5)

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ASBESTOS HANDLING PROGRAM REQUIREMENTS

These requirements are based on the OSHA Asbestos Standard and the need to protect the health of workers.

- I. Notify contractors of legal requirements to comply with the OSHA Asbestos Standard. Champion should ensure that the contractor is aware of and will comply with OSHA 29 CFR 1910.1001 (Attachment E). Require written confirmation of these points and make this requirement a part of the contract, or a written acknowledgment before any work is done.
- II. Perform Bulk Sampling of insulation materials before work starts (if possible) to determine if they contain asbestos. One approach would be to survey all areas containing insulation at one time and record and label those areas that contain asbestos (see Attachment B).
- III. Ensure that Safety Practices for Short Term Maintenance Work with Asbestos are followed by supervisors and workers (see Attachment A and C).
- IV. Perform air sampling of personnel areas to determine Time Weighted Average (TWA) and ceiling concentrations during performance of work with asbestos. OSHA requires that we monitor for asbestos every time we work with the material. Air monitoring can be arranged by calling Dale Shapiro (Chamcon 227-6493) as soon as maintenance work with asbestos is scheduled, giving a 2 week notice, if possible. Air monitoring will be done by trained personnel using approved procedures. We recommend that locations which do frequent maintenance work on asbestos insulation purchase their own monitoring equipment (see Attachment D). The Industrial Hygienist will train local safety supervisors, if required.
- V. Notify employees in writing of results of air sampling within five (5) days if values are above Permissible Exposure Limits (either TWA or ceiling - Attachment E).
- VI. Initiate appropriate medical surveillance based on air monitoring results. If exposure is equal to or greater than 0.1 fiber/cc, medical surveillance as described in Section (J) or the standard is required (Attachment E, Page E-2).

Safety Practices for Short Term
Maintenance Work with Asbestos

- I. Notify Loss Prevention Department before beginning work with any insulation.
- II. Identify where possible the type of material present.
- III. Follow the ASBESTOS WORK PROCEDURE below when insulation material contains asbestos or has not been identified.
 - A. Rope off or barricade area where work is to be performed.
 - B. Post caution signs (20" x 14") that all employees can see from all entrances and passageways.

Letter Size

- | | | |
|--|----------|--------------------|
| - ASBESTOS | 1" | |
| - DUST HAZARD | 3/4" | |
| - AVOID BREATHING DUST | 1/4" | |
| - WEAR ASSIGNED PROTECTIVE EQUIPMENT | 1/4" | Yellow background |
| - DO NOT REMAIN IN AREA UNLESS YOUR
WORK REQUIRES IT | 1/4" | with black letters |
| - BREATHING ASBESTOS DUST MAY BE
HAZARDOUS TO YOUR HEALTH | 14 point | |

- C. Wear personal protective equipment when inside roped area: disposable clothing, foot covering, head covering, gloves (optional), NIOSH approved respirator for asbestos.
- D. Cover Work Area where possible with a disposable plastic drop cloth to prevent spreading of material.
- E. Wet down old insulation material before and during work to prevent fibers from becoming airborne; use fine low pressure spray as from a garden hose.
- F. Do not use compressed air to clean equipment after working with insulation; vacuum or wet sweep.
- G. Bag and tag waste material - do not drop loose insulation to a lower floor. Collect and dispose of material in sealed plastic bag or container. Attach the following warning label to each bag or container.

- CAUTION -

Contains ASBESTOS Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause Serious Bodily Harm

- H. Dispose of protective clothing in the same manner as insulation waste. Do not take contaminated disposable clothing home.
- I. Dispose of waste material containing asbestos - follow Local, State or Federal Regulations. (Contact Regional Environmental Manager for Assistance).

BULK SAMPLING FOR ASBESTOS

The following procedure should be used to determine if asbestos is present in all areas where work is planned. It is important to determine if asbestos is present, so that proper work procedures can be followed and air monitoring can be scheduled.

1. Locate all areas to be sampled.
2. Obtain insulation samples. Cut a 1" x 1" plug from the surface of the insulation to the core. If the insulation was applied in layers, this plug will allow identification of all types of insulation present*.
3. Package each plug separately in a numbered container. Empty film canisters or small plastic prescription bottles make good sample containers.
4. Fill out the request for asbestos determination form (see Attachment B-1). As each sample is collected, record sample number on container and data sheet.
5. Send samples with the accompanying completed data sheet to a laboratory for analysis. Keep an extra copy of the completed data sheet for your records. The Corporate Science and Technology Laboratory in Hamilton is able to perform this identification. Please call Tom Eby (Chamcon 428-5325) to alert him that you are sending samples.
6. If results indicate the presence of asbestos, call Dale Shapiro (Chamcon 227-6493) to discuss air sampling and control measures.

*NOTE: The person performing the bulk sampling should be equipped with, as a minimum, a dust mask approved for asbestos and gloves.