

Caven T. King



ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

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D. J. Lines
Technological Superintendent

Jim Line
Plant Engineer

W. M. Linington
Operations Superintendent

Tom Long
Maintenance Superintendent

A. L. McClary
Safety Director

G. C. Myatt
Powerhouse Superintendent

R. D. Bird
Laboratory Director

Paul Hudson
Security Director

R. J. Nelson
Assistant Plant Manager

D. J. Hepler
Plant Manager

D. W. Riner
(ECP 002 Asbestos/TECH3)

ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

- I. SCOPE
- II. WORK ORDER
- III. RESPONSIBILITY

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ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

I. SCOPE

Much of the insulation in the plant contains asbestos. Friable asbestos is a hazardous material and requires special handling. Disposal of any type asbestos is allowed only to facilities licensed to accept it. The following procedures must be followed when removing insulation.

II. WORK ORDER

- A. The owner of the equipment involved must initiate a work order for insulation removal. He should indicate on the work order an estimate of the surface area involved. This procedure must be followed on jobs where insulation removal is incidental to other work as well as where insulation is the primary objective.
- B. The work order should follow normal channels until the point at which a number is to be assigned. Before assigning a number, the work order should be routed to the Environmental/Quality section of the Technological Department (Hector DeLa Garza, Tony Dunn).
- C. The Environmental Group will take the following action.
 1. Check the records to determine if the insulation involved contains asbestos. Primary source will be the survey provided by the RMC Industrial Hygiene Group from Richmond in 1984. If not covered in this survey, the material involved will be tested by the Sherwin Lab and/or outside laboratories.
 2. If asbestos is involved, the Environmental Group will make a friability determination for record only. They will verify the quantity involved and notify the appropriate environmental agency as required. At this point, the determination will be made whether to use the plant staging area or to place the insulation directly into the transporter's containers.
 3. When notification is completed, the work order will be returned to the normal system with a listing of any special requirements over and above normal asbestos handling procedures.
 4. A copy of the work order and any associated correspondence will be sent to the Safety Department at this time for review and comment if desired.
- D. Upon receipt of the work order from the Environmental Group, a number can be assigned and work can begin.

III. RESPONSIBILITY

A. Plant Forces

The General Foreman having control of the crew removing the insulation is responsible for the following:

1. Providing protective clothing to include dust mask, disposable coveralls, head and foot coverings and gloves.
2. Posting warning signs around the work area.
3. Placing insulation in the proper bags and removing to the staging area.
4. Keeping a daily count of bags removed to the staging area and coordinating with the Environmental Group to insure that the material is removed in a timely manner (90 days maximum holding time).

B. Contractor

The contractor is responsible for the proper handling of the asbestos-containing insulation by his crew. This includes Items 1 through 4 in "A" above.

C. Project Engineer

The project engineer is responsible for overseeing the contractor and assuring that the proper procedures are followed.

D. Environmental Group

The Environmental Group will follow the inventory of waste insulation and prepare the Hazardous Waste Manifest as required.

E. Safety Department

The Safety Department will assist in monitoring the removal operation and coordinate with governmental safety agencies as required.

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