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UNION CARBIDE

INTERNAL CORRESPONDENCE

SAFETY AND HEALTH DEPARTMENT
South Charleston Plant

P. O. Box 8004
South Charleston, WV 25303

TO: All Department Heads

DATE: February 24, 1987

ORIG. DEPT:

CC: S. W. Drake
C. R. Rotthoff
M. J. Shoger

SUBJECT: Labelling of Asbestos Materials

Attached is a copy of the Safety and Health Technology Manual Standard Practice for Removal and Handling Asbestos Containing Insulation Material. Section 2.2.4 and the new Construction Standard for Asbestos (Section Kii,iii)) now require that whenever feasible, installed asbestos products shall contain a visible label warning that asbestos fibers create a lung disease hazard.

The specified warning labels can be obtained from Orr Safety Supply. The purchase order number is SSC5388001, and the cost is approximately $45.00 for a roll of 1000.

If I may be of further assistance, pleases contact me at your convenience.

W. J. Vincent

W. J. Vincent

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Attachment

REMOVAL AND HANDLING ASBESTOS-CONTAINING INSULATION MATERIAL

1 GENERAL

1.1 This Practice provides a procedure for the safe removal and handling of asbestos-containing insulation material and compliance with OSHA regulation 29 CFR 1910.1001 and 1926.58 and EPA regulation 40 CFR 61 Subpart M. The purpose of the Practice is to ensure the safety and health of employees directly involved with performing the work and of others, either in the immediate area or downwind, who may be exposed to residual dust/fibers. Insulation material containing asbestos is no longer installed by UCC; therefore, the concern of this Practice is to control renovation and demolition operations involving the removal of old, asbestos-containing insulation; in these activities OSHA Standard 29 CFR 1926.58 is applicable. For additional details, review the OSHA Standards.

All insulation materials approved through the use of UCC Insulation Standards have been specified asbestos-free since 1976.

2 STANDARDS

2.1 Permissible Exposure Limits

2.1.1 Employee 8-hour time-weighted average exposure to airborne concentrations of asbestos fibers shall not exceed 0.2 fibers, longer than 5 micrometers, per cubic centimeter of air.

2.1.2 An action level of 0.1 fibers, longer than 5 micrometers, per cubic centimeter of air has been set which triggers the monitoring, medical, and employee information and training requirements.

2.2 Work Practices

2.2.1 Insofar as practicable, demolition, removal or handling of asbestos-containing insulation shall be performed while the material is in a sufficiently wet state to prevent emission of airborne fibers exceeding exposure limits prescribed in 2.1.1 and 2.1.2. See Section 2.7.3 for the specific EPA regulations that control work practices. Wherever feasible, the employer shall establish negative-pressure enclosures before commencing removal, demolition, and rennovation operations.

2.2.2 Caution signs shall be posted at all approaches to areas which may contain excessive concentrations of airborne asbestos fibers so that an employee may read the signs and take necessary protective steps before entering the area. The signs shall state:

DANGER-ASBESTOS;
CANCER AND LUNG DISEASE
HAZARD - AUTHORIZED PERSONNEL ONLY;
RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA

In addition to these signs, legible signs warning of the health hazards of asbestos shall be provided and displayed at each location where airborne concentrations of asbestos fibers may exceed the exposure limits listed in Section 2.1.1. See Section 2.6.4.4 for additional requirements for posting signs. Whenever feasible, a negative pressure enclosure must be established before commencing removal, demolition or rennovation operation. Air exhausted from the enclosure must pass through a HEP filter (See 29 CFR 1926.58).

2.2.2.1 An appropriate barricade, using caution or barrier tape for example, shall be erected around the perimeter of outdoor areas as a supplementary, protective measure to discourage unauthorized entry.

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2.2.3 Insofar as practicable, removed insulation shall be wetted and placed directly into labeled plastic bags (or other suitable containers) for disposal at an approved landfill. Otherwise, place plastic sheeting beneath the job site, mist spray the removed insulation with water, amended water, or wetting agent and then place in plastic bags. When wet methods of removal/cleanup are impractical, e.g., when temperatures are below freezing, vacuuming or sweeping may serve as an effective alternate cleanup method. Sweeping compound shall be applied to the work area to prevent dust generation when sweeping. See Sections 2.7.3.7 and 2.7.4 for specific work practice requirements.

2.2.4 Label Specifications - Container caution labels shall be printed in letters of sufficient size and contrast as to be readily visible and legible. Where feasible, installed asbestos-containing products shall also contain a visible label. The label shall state:

DANGER - CONTAINS ASBESTOS FIBERS;
AVOID CREATING DUST;
CANCER AND LUNG DISEASE HAZARD

Where feasible, installed asbestos containing products should be labeled in accordance with 2.2.4.

2.2.5 Regulated Areas - Employers must identify as regulated areas any locations in their workplaces where there may be occupational exposures to airborne concentrations of asbestos above the PEL. Only authorized persons, with proper respiratory protection, may enter regulated areas which must be clearly posted. Eating, drinking, and smoking are prohibited in regulated areas.

2.2.6 Housekeeping - All external surfaces in any place of employment shall be maintained free of accumulation of asbestos fibers. Special attention should be given to cleaning scaffolds used in demolition work. Clean-up of asbestos dust is prohibited with compressed air, dry-sweeping or any dry clean-up process.

2.2.7 Waste Disposal - Asbestos waste, scrap, debris, bags, containers, equipment, and asbestos-contaminated disposable clothing, that is consigned for disposal and which may produce airborne concentrations of asbestos fibers in excess of permissible exposure limits, shall be collected and disposed of in sealed leak-tight containers to an approved landfill. See Section 2.6.4 for specific disposal requirements.

2.3 Personal Protective Equipment

2.3.1 Respiratory Protection - Employees engaged in the spraying (wetting-down) of asbestos, the removal; in the demolition of pipes, structures, or equipment covered or insulated with asbestos; and in the removal or demolition of asbestos insulation or coverings shall be provided with respiratory equipment based on the air concentration in Table I and selected from among those approved by the Mine Safety and Health Administration, Department of the Interior, or the National Institute of Occupational Safety and Health, Department of Health and Human Services described in 30 CFR Part 11. Compliance with exposure limits prescribed in 2.1, Permissible Exposure Limits, shall not be achieved by the use of respirators, except:

1. During the interval necessary to install or implement feasible engineering and work practice controls,

2. In work operations such as maintenance and repair activities or other activities which the employer establishes that engineering and work practice control procedures are not feasible,

3. In work situations where feasible engineering and work practice controls are not yet sufficient to reduce exposure to or below the PEL,

4. In emergencies.

Where respirators are permitted the employer shall provide a powered, air purifying respirator in lieu of any negative pressure respirator specified in Table 1 whenever:

a. An employee chooses to use this type of respirator; and
b. This respirator will provide adequate protection to the employee.

22.5.1.2

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