

memo from:
Abram D. Reynolds

August 18, 1987

TO: D. V. Hopkins

SUBJ: ABESTOS CONTROL/REMOVAL
PROGRAM AND PROCEDURES

Attached is memo from R. E.
Hanneman on asbestos. Please
comply with procedures.

RECEIVED

ADR

AUG 21 1987

PLANT
SHERMAN

EYNOLDS METALS COMPANY
CHMOND, VIRGINIA 23261 • 804/281-4467



003490

August 14, 1987

TO: A. D. Reynolds

cc: R. G. Holder
Y. M. Brandt
H. M. Cole
D. C. Tipton
L. C. Tropea

FROM: R. E. Hanneman *Ree*

SUBJECT: ASBESTOS CONTROL/REMOVAL PROGRAM AND PROCEDURES

Significant progress has been made in the past several years in many areas of Reynolds Metals in the removal and replacement of asbestos and control of the exposure to asbestos (of our employees). In addition, audits have been made to quantify the scope of the asbestos risk and the costs involved to remove, replace or repair bulk insulating asbestos containing materials. The costs for asbestos removal/replacement and repair in your plants, which emerged from the above mentioned audits, are shown on Attachment I to this memo.

New Federal regulations reducing allowable asbestos exposure in the workplace, which took effect on January 16, 1987, make it very much in Reynolds' best interests to implement a renewed, focused and timely program to remove or repair certain bulk insulating asbestos containing materials in our plants. This should alleviate potential employee exposure to these materials. Without question, it is also in Reynolds' best interests to deal with these situations sooner rather than later because of possible future medical liability risks.

Basically, the recommended approach involves removing and replacing damaged, friable asbestos containing insulation along with asbestos containing insulation which will be disturbed by routine maintenance activities during the next year. Asbestos containing insulation which is intact, with little potential for future damage, has been identified for repair only where required.

We believe the program which has been developed is sound, given our interests in improving our plant environments and reducing future costs and liability risks.

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I have reviewed the matter with Dick Holder, and he has asked that I request from you a specific plan for asbestos removal, replacement or repair in all of your facilities by 4th Quarter, 1990.

It is very important that we use only qualified contractors from the attached list (Attachment II) developed by the Industrial Hygiene Department for this work. Use of the enclosed "Asbestos Abatement Contractor Audit Form" (Attachment III) will help your staff monitor contractor performance. The completed form should be sent to Industrial Hygiene at the completion of each project. Any questions on these items should be directed to Ron Benton (Ext. 2265).

Bill Strain (Ext. 2502) of my CQA&TO staff will be happy to work with you in developing your plans. Any questions on the disposal of asbestos wastes should be directed to Chuck Bent (Ext. 2918).

Thanks for your help.

rh2437
Attachments

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RAW MATERIALS DIVISION

<u>PLANT</u>	<u>COST TO REPAIR</u>	<u>COST TO REMOVE</u>	<u>COST TO REPLACE</u>	<u>PLANT TOTAL</u>
Sherwin	\$1,507,000	\$13,500	\$2,238,500	\$3,759,000

Hurricane Creek not included because of decommisioning and demolition by outside contractors.

APPROVED ASBESTOS CONTRACTORS

- | | |
|---|---|
| (1) Lake Oswego Insulation Company
5845 SW McEwan Road
Lake Oswego, Oregon 97034 | (14) Thorpe Insulation Co.
P. O. Box 9785
Corpus Christi, TX 78469 |
| (2) AC and S Inc.
2316 Watterson Trail
Louisville, KY 40299 | (15) C. E. Thurston & Sons, Inc.
2605 Cofer Road
Richmond, VA 23224 |
| (3) Long Services Corporation
8025-1-th Avenue S
Seattle, WA 98108 | (16) Sublett & Associates, Inc.
P. O. Box 716
Oklahoma City, OK 73101 |
| (4) Masterclean of NC, Inc.
2511 Empire Drive
Winston-Salem, NC 27103 | (17) Thermo Tech, Inc.
4888 Loop Central Drive
Suite 400
Houston, TX 77081 |
| (5) Western Asbestos Abatement Co.
7008 NE 40th Avenue
Vancouver, WA 98661 | (18) Service Painting Company
of Arkansas
P. O. Box 95
Ashdown, AR 71822 |
| (6) Professional Asbestos Removal
1548 N. Barnes Avenue
Springfield, MO 65802 | (19) Shook & Fletcher Insul. Co.
P. O. Box 1822
Decatur, AL 35601 |
| (7) Mechanical Insulation Systems, Inc.
P. O. Box 822
Springfield, MO 65801 | (20) Shook & Fletcher Insul. Co.
500A North Congress Ave.
Evansville, IN 47715 |
| (8) Merico Abatement Contractors, Inc.
701 Gum Springs Road
Longview, TX 75602 | (21) Specialty Systems of IN, Inc.
3490 Smith Valley Road
Greenwood, IN 46142 |
| (9) Metalclad Insulation Corporation
4233 West Marginal Way, SW
Seattle, WA 98106 | (22) Specialty Systems of OH
Const., Inc.
506 West Eaton Pike
Richmond, IN 47374 |
| (10) PCI Pettus Construction Inc.
P. O. Box 6
Lahoma, Oklahoma 73754 | (23) Spinazzolo Systems, Inc.
P. O. Box 9345
Hampton, VA 23670 |
| (11) Petrin Corporation
P. O. Box 80239
Baton Rouge, LA 70898 | (24) Standard Specialty Cont., Inc
1105 N. Church St.
Charlotte, NC 28206 |
| (12) PICO INC.
Route 3, Box 140
Tuttle, Oklahoma 73089 | (25) Restec Contractors Inc.
P. O. Box 1305
Woodinville, WA 98072-1305 |
| (13) ROMAC, INC.
403 Roberts Avenue
Louisville, KY 40214 | |

APPROVED CONTRACTORS

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- (26) W. W. Nash & Sons, Inc.
1400 Brook Road
Richmond, VA 23220
- (27) Young Group of Little Rock, Inc.
P. O. Box 1005
1809 East 23rd St.
Little Rock, AR 72203
- (28) Thermo Tech, Inc.
12727 Featherwood Drive
Suite 125
Houston, TX 77034
- (29) Environmental Insulation Services
5930 Centralcrest
Houston, TX 77092
- (30) FARS, INC.
3932 Canterbury
Kalamazoo, MI 49007
- (31) J. Graves Insulation Company, Inc.
P. O. Box 336
Mabelvale
Arkansas 72103
- (32) Indus Corporation
18804 North Creek Parkway
Suite 109
Bothell, WA 98011
- (33) Insulation Services, Inc.
3156 Three Mile Rd., NW
Grand Rapids, MI 49504
- (34) J & R Salvage
Brooks
Kentucky
- (35) K Insulation Company &
General Contracting
3501 Williams Road
Little Rock, AR 72206
- (36) J & J Insulation &
Acoustics, Inc.
660 Cantwell
Corpus Christi, TX 78408
- (37) Casonova
P. O. Box 270188
Corpus Christi, TX 78427
- (38) American Demolition, Inc.
324 N. Theard Street
Covington, LA 70433
- (39) American Demolition, Inc.
American Asbestos
Abatement, Inc.
P. O. Box 20766
Atlanta, GA 30320
- (40) American Specialty
Contractors, Inc.
P. O. Box 66375
Baton Rouge, LA 70896
- (41) Applied Asbestos Tech.
P. O. Box 93403
Atlanta, GA 30377
- (42) Artic Insulation
Box 864
Addison, TX 75001
- (43) A.A.S., Inc.
Asbestos Abatement System
203 S. Main Street
Hattiesburg,
Mississippi 39401
- (44) Cardinal Industrial
Insulation Co., Inc.
809 South Eight Street
Louisville, KY 40203
- (45) Chicago Rigging Company
2110 South Marshall Blvd
Chicago, IL 60623-3586
- (46) Bartells Materials
Management, Inc.
P. O. Box 997
Renton, WA 98057
- (47) Childs Mechanical Cont.
P. O. Box 121
Hot Springs, AR 71901
- (48) Custom Insulation Co, Inc.
P. O. Box 8049
Pine Bluff, AR 71611

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APPROVED CONTRACTORS

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- (49) Dodco, Inc.
527 Russell
P. O. Box 1172
El Dorado, AR 71730
- (50) Dore & Associates
Contracting, Inc.
P. O. Box 146
Bay City, MI 48707
- (51) Kossuth Insulators, Inc.
P. O. Box 238
Algona, Iowa 50511
- (52) Cecos International, Inc.
4879 Spring Grove Avenue
Cincinnati, OH 45232
- (53) AIR Service Company
8223 Baseline Road #40
Little Rock, AR 72209
- (54) All Gulf Contractors, Inc.
3654 Halls Mill Road
Mobile, AL 36619-9609
- (55) Industrial Specialists
P. O. Box 1630
Lake Jackson, TX 77566
- (56) Asbestos Services, Inc.
P. O. Box 141
Baroda, MI 49101
- (57) H & M Associates, Inc.
P. O. Box 4041
Montgomery, AL 36102

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ASBESTOS ABATEMENT CONTRACTOR QUESTIONNAIRE
(Use back of form, if more space needed)

Attachment II

Company Name:

Address:

Contact Person:

Telephone: /

1) Are you currently licensed by any regulatory or governmental agency for the purpose of handling asbestos materials, e.g., removal, encapsulation, enclosure, demolition, etc.? No ☐ Yes ☐ If Yes, please list.

2) List 3 previous asbestos abatement projects which you have completed. Include a brief description of each project.

3) Has your company ever been issued a citation by a federal, state, or local regulatory agency, relating to asbestos abatement activity? No ☐ Yes ☐ If Yes, please describe.

4) Has your company ever incurred penalties for non-compliance with an asbestos abatement project's specifications, including but not limited to liquidated damages or overruns in scheduled time limitations and resolutions? No ☐ Yes ☐ If Yes, please list all penalties and describe the circumstances.

5) Has your company ever been involved in an asbestos abatement project which was terminated prior to completion? No ☐ Yes ☐ If Yes, please describe.

6) Has there been any asbestos-related legal proceeding/claim in which your company has participated or is currently involved? No ☐ Yes ☐ If Yes, please describe.

7) Does your company carry liability insurance? No ☐ Yes ☐ If Yes, please describe the coverage.

I certify that the above statements are true to the best of my knowledge.

Date: / /87

Signature _____
Title _____

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CONTRACTOR ASBESTOS REMOVAL/REPAIR ADDIT

DATE _____

PLANT _____

DEPARTMENT _____

TYPE INSULATION _____

NAME OF ADDITOR _____

To ensure that the contractor is complying with the contract, please answer the following questions. Any question which is answered "No" should be explained in detail on the back of this form.

- | | <u>YES</u> | <u>NO</u> | <u>N/A</u> | |
|-----|--------------------------|--------------------------|--------------------------|---|
| 1. | ☐ | ☐ | | HAS A REGULATED AREA WITH WARNING SIGNS BEEN ESTABLISHED?* |
| 2. | ☐ | ☐ | ☐ | IS AN ENCLOSURE BEING USED (CONTAINMENT ROOM OR A GLOVE BAG)? |
| 3. | ☐ | ☐ | ☐ | IF THE ENCLOSURE IS A CONTAINMENT ROOM, IS IT KEPT UNDER NEGATIVE PRESSURE WITH A VENTILATION SYSTEM EQUIPPED WITH HEPA (HIGH EFFICIENCY PARTICULATE AIR) FILTERS? |
| 4. | ☐ | ☐ | ☐ | IF THE ENCLOSURE IS NOT BEING USED, HAS THE CONTRACTOR ESTABLISHED BORDERS TO HIS REGULATED AREA BASED ON AIR SAMPLING RESULTS? |
| 5. | ☐ | ☐ | | IS ACCESS TO THE REGULATED AREA LIMITED TO THOSE INVOLVED IN THE REMOVAL/REPAIR PROJECT? |
| 6. | ☐ | ☐ | | ARE PERSONS ENTERING THE REGULATED AREA PROVIDED WITH RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING (RUBBER FACEPIECE RESPIRATOR, HEAD, HAND, WHOLE BODY, AND FOOT COVERINGS)? |
| 7. | ☐ | ☐ | | ARE PERSONS LEAVING THE REGULATED AREA REQUIRED TO DECONTAMINATE THEMSELVES? |
| 8. | ☐ | ☐ | | ARE WET METHODS USED TO REMOVE AND CLEAN UP THE ASBESTOS-CONTAINING MATERIAL? |
| 9. | ☐ | ☐ | | IS THE WET ASBESTOS-CONTAINING WASTE PLACED IN IMPERMEABLE, LABELED PLASTIC BAGS? ** |
| 10. | ☐ | ☐ | ☐ | AFTER THE ASBESTOS-CONTAINING MATERIAL HAS BEEN REMOVED OR REPAIRED, IS A HEPA VACUUM CLEANER USED TO CLEAN ALL CONTAMINATED SURFACES? |
| 11. | ☐ | ☐ | ☐ | AFTER THE VACUUMING, ARE THESE SURFACES WET WIPED/MOPPED? |

AUDITOR'S SIGNATURE

* Warning Sign Language:

Danger
Asbestos
Cancer and Lung Disease Hazard
Authorized Personnel Only
Respirator and Protective Clothing
are required in this Area.

** Label Language:

Danger
Contains Asbestos Fibers
Avoid Creating Dust
Cancer and Lung Disease Hazard

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