Workers not aware of insulation hazards

Falling / Layon Catwalks, busy areas

Ref- Pg. 1

PLAINTIFF'S EXHIBIT RMC-10a

RACOMPANY CORRESPONDENCE

Rev. 1-68)

M:	H. DeLa Garza
O:	D. W. Riner
Y:	R. F. Nelson, W. M. Singleterry, J. B. Barbee, T. King, T. Dunn, Sid Haynes, Maintenance General Foremen, Operations Area Superintendents
E & ECT:	July 17, 1987 INSULATION INSPECTION

On July 15, Sid Haynes and I conducted an asbestos insulation inspection in Facilities 26, 30, and 33. Deterioration of weather coating and insulation on many lines and vessels has occurred through the years and the need for repair or removal is evident.

It is also evident that our personnel are not aware of the hazards involved in handling asbestos insulation. During the inspection we found line insulation (12" line) containing asbestos on top of No. 3 settler that had been stripped. In Facility 42, insulation had also been stripped off a line. Again, the insulation contained asbestos. Scalers are shooting holes in insulation to get to the pipe that is to be scaled. This was evident in many cases.

These types of practice have to be stopped. All insulation will be inspected before it is removed for any job. Proper procedures have to be followed when working around asbestos insulation. When in doubt, we can have our lab check insulation for asbestos.

Facility 26 overall needs to be worked the most. Asbestos is falling from tanks and lines and is laying on catwalks through busy access areas that can pose a problem. Area superintendents will be called upon to write work orders on many insulation jobs in an attempt to correct the situation at hand.

Hector DeLa Garza

H. DeLa Garza

cs
(Insulation Inspection/TECH3)

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(20)

ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

July 1987
Revision 1

Technological Superintendent 9 July 87.

Plant Engineer 7/5/87

Operations Superintendent

Maintenance Superintendent

Safety Director

Powerhouse Superintendent

Laboratory Director

Security Director

Assistant Plant Manager

Plant Manager

H. DeLa Garza
(ECP 002 Asbestos/TECH3)

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ENVIRONMENTAL CONTROL PROCEDURE 002

INSULATION REMOVAL

I. SCOPE

II. WORK ORDER

III. RESPONSIBILITY

ENVIRONMENTAL CONTROL PROCEDURE 002
INSULATION REMOVAL
Revision 1

I. SCOPE

Much of the insulation in the plant contains asbestos. Friable asbestos is a hazardous ~~material~~ substance and requires special handling. Disposal of any type asbestos is allowed only to facilities licensed to accept it. No insulation of any type will be disposed of on plant property, nor will it be handled by anyone other than the building trades crew trained and outfitted for removal of asbestos-containing insulation, ~~until environmental and/or building trades supervision has inspected insulation for asbestos.~~ The following procedures must be followed when removing insulation, if the insulation is deemed to contain asbestos.

VISUAL INSPECTION TO DETERMINE IF INSULATION CONTAINS ASBESTOS IS NOT POSSIBLE, SAMPLES NEED TO BE ACQUIRED & SENT TO AN ASBESTOS LAB, FOR IDENTIFICATION

II. WORK ORDER

A. The owner of the equipment involved must initiate a work order for insulation removal. He will 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. Work orders will also indicate whether re-insulation is needed.

B. The work order will be sent to the Environmental/Quality section of the Technological Department (Hector DeLa Garza, Tony Dunn) for proper identification. The Environmental/Quality section will then send the work order to proper Maintenance personnel to be assigned a work order number.

C. The Environmental Group with the help of Maintenance building trades supervisor (Sid Haynes) or foreman (Howard Cave) upon request 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. Notification for removal of insulation containing asbestos will have to be done ten (10) days in advance of removal. This applies to quantities greater than that covering 160 square feet of insulation or 260 linear feet of pipe.

Notification for small quantities will be done five (5) days in advance of removal.

4. 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.

5. 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. Insulation Removal and Renovation Contractors

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 (Plant Insulation Projects)

The project engineer is responsible for overseeing the contractor and assuring that the proper procedures are followed. The project engineer will conduct a contractor asbestos removal/repair audit as the job progresses.