PLAINTIFF'S EXHIBIT
UC-1593

| MAINTENANCE PROCEDURE | PLANT 312 BOUND BROOK MAINTENANCE DEPARTMENT | No: MP- 366.1<br>Page: 1 of 5<br>Effective: 1-26-79<br>Revised: 5/18/82<br>Approved: |
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| By: S. J. Nadbielny<br>W. D. Neal | | |

ASBESTOS REMOVAL PROCEDURE

1.0 PURPOSE

To protect workers and others from inhalation of asbestos fibers, to safely remove and dispose of insulation materials which contain friable (easily crumbled or crushed into powder) asbestos and also to specify appropriate notification to regulatory agencies.

2.0 RESPONSIBILITY

It is the responsibility of the appropriate First Line Supervisors and Craftperson to control the safe removal, disposal and notification activities.

2.1 It is the responsibility of Environmental Protection/Occupational Health (EP/OH) to notify EPA of yearly amount of asbestos activity in the plant, per R. Burstein's letter (attached).

2.2 Where unanticipated asbestos removal work is to be conducted (i.e. notification was not given at beginning of calendar year or end of previous calendar year), the responsible person must notify the EP Department (R. Burstein) 45 days prior to demolition. (Notification requirement is for demolition work-not required for repair work.)

2.3 The responsible Supervisor shall provide the following information regarding the proposed work to the Environmental Engineer and/or the Industrial Hygienist:

1. Specific location of the job site.
2. Date and time interval of the work.
3. Initiate a Hazardous Work Permit

2.4 The responsible supervisor shall ensure that employees assigned to the work have medical clearance and respirator training.

2.5 The SHARE representative shall consult the log of industrial hygiene monitoring data for corresponding work to determine the hazard rating for proper selection of respirators to be worn.

3.0 PROCEDURES

3.1 Overlap of EPA and OSHA regulations - the regulations do overlap some, as the OSHA objective is protection of workers and others directly involved. The EPA objective is protection of people everywhere. These procedures consider all regulations for each agency; EPA and OSHA.

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3.2 Personnel engaged in asbestos work.

3.2.1 Personnel engaged in asbestos work shall wear respirators and protective clothing according to the hazard rating of the job as follows:

| Hazard Rating | Fibers Per cc | Protective Clothing | Respirator |
|---|---|---|---|
| 1 | ≤ 10 | Coveralls Optional | Air Purifying (3M Disposable) |
| 2 | ≥ 10 | | Air Purifying (3M Disposable) |
| 3 | > 20 | Whole Body Coverings: Coveralls Head Covering Foot Covering Gloves | Powered Air Purifying or Type C Supplied Air, Continuous Flow or Pressure-Demand |
| 4 or Unknown Rating | > 200 | | Type C Supplied Air Continuous Flow or Pressure-Demand |

3.2.2 If the proposed job cannot be identified with a corresponding job with a hazard rating, it shall be considered to have a rating of 4 until properly monitored for an initial determination of fiber level. While this determination is being made, it is mandatory that whole body covering including coveralls, head, foot, and hand covering and supplied breathing air be used.

Upon determining the resulting fiber level, the Industrial Hygienist shall assign a hazard rating for the job and note the classification in the log for future work.

3.2.3 The SHARE representative shall enter the hazard rating on the Hazardous Work Permit to release the job if the work does not have an established hazard rating. Successive Hazardous Work Permits shall be submitted to the SHARE representative or Emergency Coordinator for entry of hazard ratings in the event that the continuation of the job may result in a change of hazard ratings.

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3.2.4 The SHARE Representative will note on the Hazardous Work Permit if further air monitoring is to be done to establish additional data.

3.2.5 No outerwear shall be worn over disposable protective clothing.

3.2.6 Persons shall desuit for breaks and lunch within the protecte work area except for jobs with Hazard Rating of 1.

3.2.7 Dispose of contaminated protective clothing in sealed, marked plastic bags, at the end of the workday.

3.2.8 Personnel engaged in asbestos work shall make every effort to minimize air borne particles.

3.3 Work Area Identification

3.3.1 Perimeter of hazardous area shall be identified with yellow barricade tape.

3.3.2 Warning signs (3.7.1) shall be posted at 50 feet intervals along barricade tape.

3.4 Removal of Insulation

3.4.1 Removal prior to demolition is required if excessive dusting is expected.

3.4.2 Insulation shall be wet down with "amended water" (1 oz. Tergitol Min-foam 2-X) per 5 gal. water, prior to removal and kept wet during removal, including that on equipment to be dismantled in sections exposing the broken edges of insulation.

3.4.3 Loose insulation stripped from equipment, pipe, etc. shall not be dropped or thrown to the ground.

3.4.4 Drop cloths are required on grating to catch falling debris.

3.4.5 Loose insulation shall be placed in plastic bags, sealed, tagged and placed in sealed fiber drums (so they won't break in loading) (3.7.2) prior to disposal.

3.4.6 Area cleanup shall be by wet or vacuum method - never use air, brooms or brushes. Waste shall be put in plastic bags, sealed and warning tags (or printing on bag) (3.7.2) applied.

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3.5 Disposal

3.5.1 Disposal is by U.C.C. EP Department.

3.5.2 Small amounts of insulation removed from repair work should be put in plastic bags and deposited in fiber drums.

3.5.3 The responsible person will notify EP Department (R. Burstein) of the number of drums (after completion of work).

3.6 Notify EP Department of annual amounts of insulation to be removed (by UCC EP Department).

3.7 Warning Communications - sign, tags and bags.

3.7.1 Signs for posting work areas and disposal sites are available from stores. They comply with OSHA copy, letter size, sign color, size, etc. Code # 69-251-005.

Asbestos Dust Hazard
Avoid Breathing Dust
Wear Assigned Protective Equipment
Do Not Remain In Area Unless Your Work Requires It
Breathing Asbestos Dust Maybe Hazardous To Your Health

3.7.2 Tags and Bags and Drums for insulation waste and contamination clothing are available in stores. They also comply with OSHA regulations regarding copy, letter size, size of tag, color, etc. Tags are available in stores.

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

3.8 The asbestos containing materials on this site are at the following locations.

3.8.1 Older elbows and fittings applied before 1973 very likely were coated with asbestos cement mixtures.

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3.8.2 "Pipelines containing hot liquids and vapors such as steam, hot water, Dowtherm, heating oil, etc. installed prior to 1973."

3.8.3 "When in doubt, treat insulation of unknown composition as asbestos until proved otherwise."

3.8.4 If identification of insulation is required contact EP/OH Department (D. Neal).

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