MAINTENANCE PROCEDURE

By: S. J. Nadbielny

PLANT 312 BOUND BROOK
MAINTENANCE DEPARTMENT

No: MP- 366.1
Page: 1 of 3
Effective: 1-26-79
Approved:

PROTECTION AGAINST BREATHING ASBESTOS

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 will notify the EP/OH Department (D. Neal) when and where asbestos containing insulation is being demolished.

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.

3.2 Personnel engaged in asbestos work.

3.2.1 Respirators must be worn where asbestos is present as follows:
Normal exposure (repair work) - (3M Paper Disposable UCC Stock #69-070-100)
Heavy exposure (Demolition work) - use supplied air respirator (working with asbestos on daily basis) or a demolition where wetting down is not feasible. (any air supplied respirator ex. Scott Air Pack or equipment.)

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

PLAINTIFF'S EXHIBIT
UC-1594

A 12812

Published by AsbestosClaims.Law
asbestosclaims.law/library/16692/1

PROTECTION AGAINST BREATHING ASBESTOS

3.2.3 Clothing that has been worn in asbestos dust shall be stored seperately from uncontaminated clothing and shall be put in plastic bags, sealed and appropriate warning tags (or printing on bag) (3.7.1) applied for laundry.

3.2.4 Clothing includes head covering, gloves and foot covering.

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 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, ect. 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.

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).

A 12813

Published by AsbestosClaims.Law
asbestosclaims.law/library/16692/2

MAINTENANCE
PROCEDURE

By: S. J. Nadbielny

PLANT 312 BOUND BROOK
MAINTENANCE DEPARTMENT

No: MP- 366.1
Page: 3 of 3
Effective: 1/26/79
Approved:

PROTECTION AGAINST BREATHING ASBESTOS

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

3.7 Warning Communications - signs, tags and bags.

3.7.1 Signs for posting work areas and disposal sites are available from Building Trades. They comply with OSHA copy, letter size, sign color, size, etc.

> 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

Purchased by Building Trades

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 at the Building Trades Office.

> CAUTION
> Contains Asbestos Fibers
> Avoid Creating Dust
> Breathing Asbestos Dust May
> Cause Serious Bodily Harm
> Danger - Cancer Hazard

Purchased by Building Trades

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

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

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)

SJN;lm
1/26/79

A 12814

Union Carbide trial exhibit UC-1594: S. J. Nadbielny, Bound Brook Plant 312 Maintenance Procedure MP-366.1, Pr... Published by AsbestosClaims.Law
ACL Doc 16692 · Page 3 of 3 asbestosclaims.law/library/16692/3