WV-0236 #38

"SHARE"

UNION CARBIDE

INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION P.O. BOX 670, BOUND BROOK, NEW JERSEY 08805
SPECIALTY CHEMICALS DIVISION

LTO

To (Name)	Mr. W. Bosserman	Date	March 30, 1983
Division			
Location Area	Sistersville	Originating Dept.	SHARE
		Area	
Copy to	Mr. W. H. Barton*	Subject	Asbestos Procedure

*Letter only

Per your recent request, I am enclosing the Bound Brook Procedure for Asbestos with background information giving salient points of our program in response to the OSHA citation of May 6, 1982.

Also included are personal monitoring data on typical asbestos removal jobs with references to figures in the addendum of the procedure. With this background data, we prescribe disposable dust respirators (3M No. 8710 or Norton No. R1070) as sufficient protection for up to five times the TLV.

P. A. Schultz

/rk
att.

PLAINTIFF'S EXHIBIT
UC-2935

UCC 016214

CONTAMINANT NAME	TLV	AIR CONC.	8-HOUR T.W.A. CONC.	SAMP TCTL TIME	EXP HRS	EXP MINS	PERSONNEL NAME	RESP WORN	DATE	RECORD NUMBER
				CENTRIFUGED PRODUCT.						
ACRYLONITRILE R&D TAHT PROCESS 203	2.000 PPM	1.40	1.40	PPM 471	7	51	WENDLAND JR	JJ	YES	02/25/83 1028
				RECOVERED PRODUCT. OPENED CENTRIFUGE WITH WET CAKE INSIDE CAUSING HIGHER EXPOSUR						
ALUMINUM OXIDE POLYETHYLENE B3 BAG DUMP 101	10.000 MG/M3	5.00		MG/M3 105			FINNERTY	JJ	YES	01/07/83 0361
				DUMPED 93 BAGS HYDRAL 710 INTO HOPPER. DUST FROM MT BAGS. ESTIMATED TWA FROM 3HR/SHIFT EXPOSURE=1.5MG/M3						
ANTIMONY OXIDE POLYETHYLENE B3 101	.500 MG/M3<	.04		135	2	30	HARCAR	S	YES	12/14/81 0314
ANTIMONY OXIDE POLYETHYLENE B3 101	.500 MG/M3<	.03	.04	190	3	30	HARCAR	S	YES	12/14/81 0314
ASBESTOS ASBESTOS REMOVAL 97	2.000 F/CC	.40 ABOVE TK-HEAD LEVEL		F/CC 44						05/18/82 0327
				FIBERS =14000 AREA ABOVE 4FT.DIA X 6FT TANK.					REF:FIG 4	
ASBESTOS ASBESTOS REMOVAL 97	2.000 F/CC	.60 ABOVE TK-HEAD LEVEL		F/CC 45						05/19/82 0328
				FIBERS =54000 AREA ABOVE 4FT.DIA X 6FT TANK.					REF:FIG 4	
ASBESTOS MAINTENANCE AREA 5 101	2.000 F/CC	.89	.09	F/CC 48		48	BAHCOSHIAN	WE	YES	01/17/83 0363
				TOTAL FIBERS=89640 REMOVED 50 LIN FT 1IN. INS. FROM 4IN.PIPE						

UCC 016215

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CONTAMINANT NAME	TLV	AIR CONC	8-HOUR T.W.A. CONC.	SAMP TOTL TIME	EXP HRS	EXP MINS	PERSONNEL NAME	RESP WORN	DATE	RECORD NUMBER
ASBESTOS	2.000 F/CC	.20	.03 F/CC	55		55	BARCH	YES	05/26/82	0329
ASBESTOS REMOVAL	1	COND FD & RET LINES								
		TOT FIBER:25000 REMOVED 2CLIN.FT. 1IN. INSULATION. REF FIG 6								
ASBESTOS	2.000 F/CC	.50	F/CC	38		38	BRZYCHCY	YES	05/18/82	0327
ASBESTOS REMOVAL	97	COND.TK OUTER COVER								
		FIBERS =40000 STRIPPED CFF OUTER LAYER,100SQFT. REF:FIG 4								
ASBESTOS	2.000 F/CC	.80	.05 F/CC	9		9	BRZYCHCY	YES	05/18/82	0327
ASBESTOS REMOVAL	97	COND.TK OUTER COVER								
		FIBERS =34000 REMOVED WIRE TO LOOSEN BLOCKS. REF:FIG 4								
ASBESTOS	2.000 F/CC	.80	.07 F/CC	44		44	BRZYCHCY	YES	05/19/82	0328
ASBESTOS REMOVAL	97	BLOCK INSUL-CLEANUP								
		FIBERS =68000 REMOVED BLOCK INS. PLACED IN BAGS. REF:FIG 4								
ASBESTOS	2.000 F/CC	.80	.40	215	3	25	BRZYCHCY SJ	YES	08/16/82	0344
ASBESTOS REMOVAL	203	DOWTHERM.TANK								
ASBESTOS	2.000 F/CC	.15	F/CC	16		16	COLLINS DT	YES	09/17/82	0347
ASBESTOS REMOVAL	41	DOWTHERM.BOILER								
		TOT FIBER: 4980 PUNCHED 8 1IN.HOLES IN 4 12IN.X.1IN DISCS.								
ASBESTOS	2.000 F/CC	.54	.09 F/CC	35	1	10	COLLINS DT	YES	09/17/82	0347
ASBESTOS REMOVAL	41	DOWTHERM.BOILER								
		TOT FIBER: 39010 REMOVED 2 OF 4 OLD RUPTURE DISCS AND REPLACD WITH NEW. ASSUME SAME EXPOSURE FOR 2 DISCS NOT SAMPLES.								
ASBESTOS	2.000 F/CC	.05	F/CC	10		10	FOBERT DA	YES	10/26/82	0348
ASBESTOS REMOVAL	CUT	400 LE.STEAM LINE								
		TOTAL FIBERS=1080 REMOVED 9LIN FT 2IN. INS FROM 10IN. PIPE								

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CONTAMINANT NAME	TLV	AIR CONC	8-HOUR T.W.A. CONC.	SAMP TOTL TIME	EXP HRS	EXP MINS	PERSONNEL NAME	RESP WORN	DATE	RECORD NUMBER
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC CUT	.02 400 LB.STEAM LINE	.01 F/CC	10		10	FOBERT, DA	YES	10/26/82	0348
		TOTAL FIBERS= 500 REMOVED 8LIN FT 2IN. INS FROM 10IN. PIPE								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC TUNNEL	4.90 CONDENSATE LINES	F/CC	31		31	FUNK	YES	05/13/82	0325
		TOTAL FIBERS=317000 MONITOR ON RIGHTSIDE REFER FIG. 3 REMOVED 50 LINEAL FT 2 IN. INSULATION FROM HOT 4IN. PIPING SOME DUSTING FROM INCOMPLETE WETTING.								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC TUNNEL	3.40 CLEANUP	.54 F/CC	31		31	FUNK	YES	05/13/82	0325
		TOTAL FIBERS=224000 MONITOR ON LEFT SIDE REFER FIG. 3 LOADED DEBRIS INTO PLASTIC BAGS & DRUMS.								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC TUNNEL	4.80 CONDENSATE LINES	F/CC	31		31	FUNK FB	YES	05/13/82	0325
		TOTAL FIBERS=312000 MONITOR ON LEFT SIDE REFER FIG. 3 REMOVED 50 LINEAL FT 2 IN. INSULATION FROM HOT 4IN. PIPING SOME DUSTING FROM INCOMPLETE WETTING.								
ASBESTOS ENERGY SYSTEMS	2.000 F/CC 55C	.06	.00 F/CC	29		29	HOEHLER CW	YES	01/25/83	0364
		TOTAL FIBERS=4150 REMOVED 23FT 1X1/8 IN. TAPE FROM WIRING								
ASBESTOS ENERGY SYSTEMS	2.000 F/CC 55C	.02	.00 F/CC	29		29	JACKSON ER	YES	01/25/83	0364
		TOTAL FIBERS=1660 OPERATED HIGH EFFICIENCY VACUUM CLEANER								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC < 10	.01 <	.01 F/CC	13		13	KEMPTON E	YES	10/25/82	0349
		TOTAL FIBERS= 166 REMOVED 22LIN FT 1IN. INS FROM 386IN. PIPE								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 10	.03	.01 F/CC	13		13	KUBECK L	YES	10/25/82	0349

UCC 016217

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CONTAMINANT NAME	TLV	AIR CONC	8-HOUR T.W.A. CONC.	SAMP TOTL TIME	EXP HRS	EXP MINS	PERSONNEL NAME	RESP WORN	DATE	RECORD NUMBER
							TOTAL FIBERS= 913 REMOVED 22LIN FT 1IN. INS FROM 386IN. PIPE			
ASBESTOS MAINTENANCE AREA 5	2.000 F/CC 101	.79	.08 F/CC	47		47	MISHLER	RL YES	01/17/83	0363
							TOTAL FIBERS=78000 OPER FLT-PLACED SCRAP INS.INTO FIBER DRUMS			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	1.20 TILL 2 RECEIVER		F/CC	34	34	PICKETT	YES	05/11/82	0324
							TOTAL FIBERS= 88000 MONITOR ON RIGHT SIDE REFER FIG. 5 REMOVED 35G FT 1.5IN INSULATION			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	2.20 CONDENSATE LINES	.2C	F/CC	27	27	PICKETT	YES	05/11/82	0326
							TOTAL FIBERS=125000 MONITOR ON LEFT SIDE REFER FIG. 2 REMOVED 9FT 1IN INSULATION			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	.40 STM LINE TO S-23		F/CC	31	31	PICKETT	YES	05/13/82	0326
							TOT FIBER:23000LEFT SIDE.REMOVED 18LIN.FT 1IN.INSLN.REF:FIG 1			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	.60 STM LINE TO S-23	.04	F/CC	31	31	PICKETT	YES	05/13/82	0326
							TOT FIBER:40000RIGHTSIDE.REMOVED 18LIN.FT 1IN.INSLN.REF:FIG 1			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	1.00 TILL 2 RECEIVER		F/CC	34	34	PICKETT EJ	YES	05/11/82	0324
							TOTAL FIBERS= 74000 MONITOR ON LEFT SIDE REFER FIG. 5 REMOVED 35G FT 1.5IN INSULATION			
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 21	2.10 CONDENSATE LINES		F/CC	27	27	PICKETT EJ	YES	05/11/82	0324
							TOTAL FIBERS=122000 MONITOR ON RIGHT SIDE REFER FIG. 2 REMOVED 9FT 1IN INSULATION			

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CONTAMINANT NAME	TLV	AIR CONC	8-HOUR T.W.A. CONC.	SAMP TOTL TIME	EXP HRS	EXP MINS	PERSONNEL NAME	RESP WORN	DATE	RECORD NUMBER
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC CUT	.02 400 LB.STEAM LINE		F/CC 15		15	TEFFENHART L	YES	10/26/82	0348
		TOTAL FIBERS= 500 REMOVED 9LIN FT 2IN. INS FROM 10IN. PIPE								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC CUT	.03 400 LB.STEAM LINE	.01	F/CC 10		10	TEFFENHART L	YES	10/26/82	0348
		TOTAL FIBERS= 664 REMOVED 8LIN FT 2IN. INS FROM 10IN. PIPE								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 97	.40 COND.TK OUTER COVER		F/CC 26		26	WINNICKI	YES	05/18/82	0327
		FIBERS =23000 PUNCHED HOLES IN INSULATION TO WET. REF:FIG 4								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 97	.30 COND.TK OUTER COVER	.05	F/CC 44		44	WINNICKI	YES	05/18/82	0327
		FIBERS =25000 STRIPPED OFF OUTER LAYER,100SQFT. REF:FIG 4								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 97	.80 BLOCK INSUL-CLEANUP	.07	F/CC 44		44	WINNICKI	YES	05/19/82	0328
		FIBERS =74000 REMOVED BLOCK INS. PLACED IN BAGS. REF:FIG 4								
ASBESTOS ASBESTOS REMOVAL	2.000 F/CC 203	.50 DOWTHERM.TANK	.20	215	3	25	WINNICKI AO	YES	08/16/82	0344
BARIUM HYDROXIDE PHENOLICS	.500 MG/M3 41	.60		MG/M3 6		6	GERENZA JR JJ	YES	12/01/82	0357
		DUMPED 6 BAGS + PARTIAL INTO BUGGY FOR BRN 2766 IN STILL 17. SOME DUSTING DUE TO NOT USING VENTILATED WEIGH STATION.								
BARIUM HYDROXIDE PHENOLICS	.500 MG/M3 41	.18		MG/M3 44		44	ZUZA CJ	YES	12/02/82	0358
		DUMPED 6 BAGS + PARTIAL INTO BUGGY FOR BRN 2766 IN STILL 17. NO DUSTING DUE TO USE OF VENTILATED WEIGH STATION.SLIGHT DUST FROM STACKING EMPTY BAGS. ADDED WATER + STEAM TO DISSOLVE.								

UCC 016219

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MAINTENANCE PROCEDURE

By: S. J. Nadbielny
W. D. Neal

PLANT 312 BOUND BROOK
MAINTENANCE DEPARTMENT

No: MP- 366.1
Page: 1 of 5
Effective: 1-26-79
Revised: 5/25/82
Approved:

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).

we need →

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.)

we need →

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.

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.

we need →

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MAINTENANCE PROCEDURE	PLANT 312 BOUND BROOK MAINTENANCE DEPARTMENT	No: MP- 366.1
By: S. J. Nadbielny W. D. Neal		Page: 2 of 5
		Effective: 1-26-79 Revised: 5-25-82 Approved:

ASBESTOS REMOVAL PROCEDURE

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

we need all of this

To determine the hazard rating, compare the proposed job with typical jobs already monitored (See Addendum I). If the job is not similar to one listed, it must be treated as rated 4 requiring air-supplied respiratory protection.

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.

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 No outerwear shall be worn over disposable protective clothing.

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

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

3.2.7 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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MAINTENANCE PROCEDURE	PLANT 312 BOUND BROOK MAINTENANCE DEPARTMENT	No: MP- 366.1
By: S. J. Nadbielny W. D. Neal		Page: 4 of 5 Effective: 1-26-79 Revised: 5-25-82 Approved:

ASBESTOS REMOVAL PROCEDURE

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. Can we order from a comercial supplier? I'll call BB. WB

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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MAINTENANCE PROCEDURE	UNION CARBIDE	No: MP- 366.1
By: S. J. Nadbielny W. D. Neal	PLANT 312 BOUND BROOK MAINTENANCE DEPARTMENT	Page: 5 of 5 Effective: 1-26-79 Revised: 5-25-82 Approved:

ASBESTOS REMOVAL PROCEDURE

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

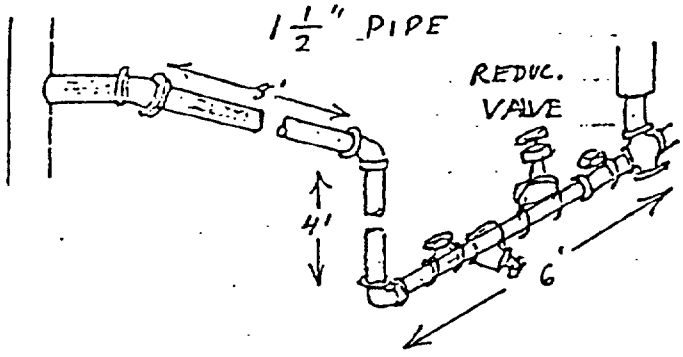
3.8.3 "When in doubt, treat insulation of unknown composition as asbestos until proved otherwise."

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

UCC 016224

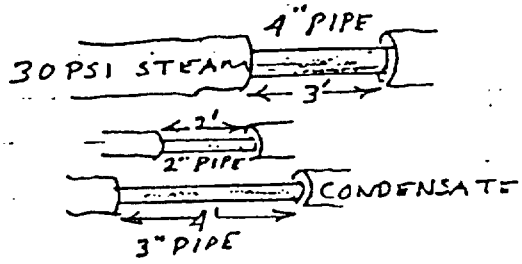
ADDENDUM I

TYPICAL INSULATION REMOVAL JOBS
WITH HAZARD RATING OF 1



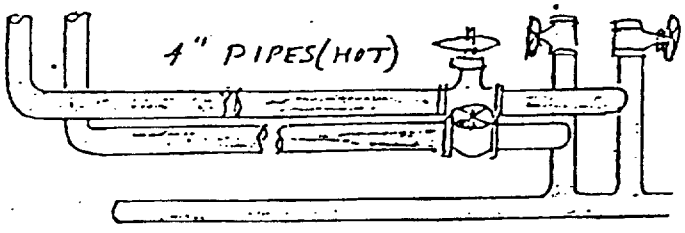
18 FT. 1" INSULATION

FIG. 1: STILL 23 STEAM SUPPLY, BLDG. 21



9: FT. 1" INSULATION REMOVED WHILE HOT

FIG. 2 CONDENSATE LINES, WEST WALL, BLDG. 21



50 FT 2" INSULATION

FIG. 3: TUNNEL, A7 TO A12

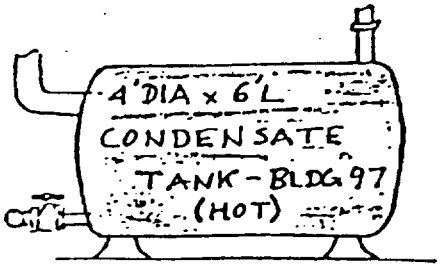


FIG. 4: 100 SQ FT 1½" BLOCK INS. WITH MASTIC COVERING

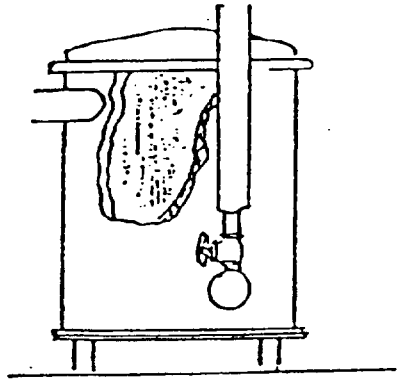


FIG. 5: STILL 2 RECEIVER, BLDG. 21
3 SQ FT. 1½" INSULATION

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HIGHLIGHTS OF ASBESTOS PROGRAM

- OSHA 1910.1001 CANNOT BE PRACTICALLY ADMINISTERED DUE TO FULL SUIT UP AND SELF-CONTAINED BREATHING REQUIREMENT ON ALL JOBS.

- ESTABLISHED COMPROMISE PROGRAM BASED UPON DEPARTMENT OF LABOR COMPLIANCE SECTION INTERPRETATIONS OF REGULATION 1910.1001 ALLOWING THAT EXACT COMPLIANCE TO 1910.1001 WOULD RESULT IN A DE MINIMUS TECHNICAL VIOLATION PROVIDED THAT ELEMENTS OF THE "INTERPRETATION" ARE FOLLOWED.

- DEVELOPED TYPICAL JOB CATEGORIES AND GENERATED DATA SHOWING FIBER COUNT FOR EACH CATEGORY--ALL OF WHICH ARE AT LEAST 75% LESS THAN TWA STANDARD.

- ESTABLISHED ONGOING PROGRAM TO EXPAND DATA BASE FOR EACH CATEGORY.

- REVISED ASBESTOS REMOVAL PROCEDURE TO COMPLY WITH OSHA STANDARDS BY MEANS OF JOB CATEGORY CONCEPT.

- STRENGTHENED COMPLIANCE TO PLANT'S RESPIRATOR PROGRAMS IN LINE ORGANIATION, I.E., MEDICAL QUALIFICATIONS, FIT TESTING, FACIAL HAIR POLICY.

- KEYS TO COMPLIANCE ARE:
  - USE OF "AMENDED WATER".
  - PROPER HANDLING TECHNIQUES BY PERSONNEL.
  - THROUGH TRAINING OF INVOLVED PERSONNEL.

PAS/RK
6/3/82

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POINTS TO REMEMBER

1. OPERATING DEPARTMENT IS RESPONSIBLE TO IDENTIFY ALL JOBS THAT COULD INVOLVE ASBESTOS REMOVAL.

2. ALL JOBS THAT COULD INVOLVE ASBESTOS REMOVAL REQUIRE A HAZARDOUS WORK PERMIT. ON SHIFTS, ASBESTOS REMOVAL WILL BE CONSIDERED "CLASS B" WORK.

3. WETTING OF INSULATION, PRIOR TO REMOVAL, WITH "AMENDED WATER" IS REQUIRED.

   1 OZ. TERGITOL PER 5-GAL. WATER

4. ASBESTOS REMOVAL SIGNS ARE TO BE POSTED AT THE JOB PERIMETER AND ARE AVAILABLE IN STORES. CODE 69-251-005.

5. ALL RESPIRATOR USERS MUST BE MEDICALLY QUALIFIED.

6. ALL EMPLOYEES TRAINED IN THE ASBESTOS REMOVAL PROCEDURE SHALL BE RECORDED ON STAIRS.

EJB/RK
5/25/82

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STATUS OF ASBESTOS MONITORING PROGRAM

OSHA 1910.1001 TLV'S 8 TWA = 2 FIBERS/CC

15 MIN. CEILING = 10 FIBERS/CC

- 5 INSULATION REMOVAL JOBS MONITORED MAY 11-19.

  4 HAD LEVELS UNDER 0.5 F/CC

  1 EXCEEDED TLV WITH 5 F/CC DUE TO INADEQUATE WETTING.

  WET DOWN IS THE KEY WITH NEED FOR IMPROVED TECHNIQUES.

- TEST PROGRAM CONTINUING BUT END IS IN SIGHT

- ASBESTOS REMOVAL PROCEDURE RE-REVISED FOR CRITIQUE.

- DRUM OF TERGITAL MIN-FOAM 2X IS ON TAP IN BUILDING 21 SHOP.

- HANDY-DANDY TEST KITS RECEIVED.

- WORKING UP REFERENCE MANUAL FOR ASSIGNMENT OF HAZARD RATING.

WDN/RK
5/20/82

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ADDENDUM I TO MP-366.1: ASBESTOS REMOVAL PROCEDURE

REFERRING TO MAINTENANCE PROCEDURE 366.1 "ASBESTOS REMOVAL PROCEDURE", SECTION 3.2 REQUIRES THE SPECIFYING OF PROTECTIVE CLOTHING AND RESPIRATORS ACCORDING TO "HAZARD RATING" BEFORE STARTING THE JOB.

COMPARE THE PROPOSED JOB WITH TYPICAL JOBS ALREADY MONITORED (SEE ATTACHED SHEET) AND FOUND TO HAVE A HAZARD RATING OF 1, THEREBY PERMITTING AIR-PURIFYING-TYPE RESPIRATORS RATHER THAN FORCED AIR. IF A SIMILAR JOB CAN BE FOUND, ASSIGN THE HAZARDOUS RATING GIVEN THE TESTED JOB. IF THE JOB IS NOT SIMILAR TO ONE LISTED, IT MUST BE TREATED AS RATED 4 REQUIRING AIR-SUPPLIED RESPIRATORY PROTECTION.

WDN/RK
5/20/82
ATT.

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PROPOSED ASBESTOS PROGRAM

- U/A MODIFIED ASBESTOS REMOVAL PROCEDURE WHICH MEETS OSHA REGULATION
  - MEDICAL REQUIREMENTS
  - PROTECTIVE CLOTHING OUTSIDE
  - CHANGE ROOM ISSUE FOR CONTINGENCY
- FORM UNION/MANAGEMENT COMMITTEE TO IMPROVE PROCEDURE
  - CONSIDER RECOMMENDATIONS FROM COMMITTEE FOR INCORPORATION INTO LONG TERM PROGRAM.
- FORM SHARE/MAINTENANCE COMMITTEE TO EXECUTE PRACTICAL LONG TERM PROGRAM.

  PAS/EJB/WDN/LEM/RW/?
  - IDENTIFY TYPICAL ASBESTOS REMOVAL JOB CATEGORIES FOR PLANT.
  - DEVELOP BASELINE, BACKGROUND DATA FOR EACH OF THE ABOVE CATEGORIES.
  - CATEGORIES FALLING BELOW 20 FIBERS PER CM^3 - WILL REQUIRE 3M-8710 DISPOSABLE FACE MASKS.
  - CATEGORIES FALLING BETWEEN 20-200 CM^3 WILL REQUIRE POWERED AIR PURIFIER.
  - CATEGORIES FALLING ABOVE 200 CM^3 WILL REQUIRE SCBA DURING DURATION OF JOB.
  - ALL OF THE ABOVE FALL INTO MEDICAL SURVEILLANCE PROGRAM.
- ABOVE LONG TERM PROGRAM CARRIES A "DE MININIS" RISK PENALTY BUT IS SUPPORTED BY P.O.D. SHARE.
  - GULF COAST PLANTS PRACTICE ESSENTIALLY THE SAME PROCEDURE.
  - DU PONT PRACTICES THE SAME APPROACH.

PAS/RK
5/10/82

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