CONSTRUCTION DEPARTMENT SAFETY PROCEDURE

UNION CARBIDE TECHNICAL CENTER

SOUTH CHARLESTON, WEST VIRGINIA

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| SECTION | VIII |
| PROCEDURE | -22- |
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| ISSUE DATE | 9/16/85 |
| SUPERSEDES | 4/21/83 |

SUBJECT: ASBESTOS INSULATION - REMOVAL AND DISPOSAL

PLAINTIFF'S EXHIBIT

UC-3260

PURPOSE: Establish the minimum requirements for the removal, clean-up, and disposal of asbestos containing insulation and materials.

DEFINITION: Asbestos Insulation - for the purpose of this procedure shall be defined as any insulation material that contains asbestos.

INTRODUCTION: This procedure has been written to comply with all applicable OSHA and UCC Requirements and Regulations. Compliance with this procedure will prevent any employee from becoming exposed to airborne concentrations of asbestos fibers which may be hazardous to his/her health.

PROCEDURE:

Pre-Job Planning

1A. The responsible Construction and/or Craft Superintendent shall consult with the owner of the piping or equipment from which the insulation is to be removed to determine if the insulation contains asbestos.

1B. If it cannot be determined that the insulation material contains asbestos then this procedure shall be followed to prevent employee exposure.



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2A. The Craft Supervisor responsible for the job shall notify the Industrial Hygiene Representative at that site (see 2B below), to inform them that asbestos insulation is going to be removed. The Supervisor shall provide the site Industrial Hygienist with the follow information:

1. Location of job.
2. Date and time job will begin and estimated time for completion.
3. Amount of insulation to be removed.
4. Total number of employees involved.

2B. The Industrial Hygiene Representative to be contacted is:
M. A. Patel, - Ext. 3750

2C. If the Industrial Hygiene Representative cannot be contacted the Craft Supervisor shall contact the responsible Construction Safety Representative.

3. All employees assigned to the asbestos insulation removal project shall be informed that they will be working with asbestos and that this procedure will be followed.

4. The Construction and/or Craft Superintendent shall require from the owner or responsible site representative the proper policy/procedure for disposing of the asbestos insulation at that particular site. This shall be communicated to to the responsible Craft Supervisor.



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SPECIFIC REQUIREMENTS

Special Clothing:

1A. Disposable-type coveralls shall be worn by all employees involved with the removal and clean-up of asbestos insulation.

1B. These coveralls shall have elastic in the neck opening, arm sleeves, and pant legs. This is the only type of clothing acceptable for this type of work.

1C. Disposable head coverings shall be worn at all times while in the restricted area where asbestos insulation is being removed and/or cleaned-up, or disposable coveralls with hoods can be worn if disposable head covers are not available.

2. Rubber or neoprene overshoes or boots shall be worn by all employees anytime asbestos insulation is handled. These boots must be washed and cleaned with water before they are removed from the job site or restricted area.

3. Gloves are not required by employees when they are removing or cleaning up asbestos insulation. However, suitable gloves for performing this type of work will be available at Construction Safety Supply and the Toolroom at all other locations.



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4. Respiratory equipment shall be worn by all employees while they are removing their protective clothing at the job site.

R Cleaning of Scaffold Boards:

When it becomes necessary to use scaffolds to perform asbestos related activities, the boards of scaffolds must be free of accumulations of asbestos material prior to returning them to the Carpenter shop for storage or moving them to another project. Scaffold boards shall be cleaned in the following manner:

1. Cleaning shall take place at the job site.

2. Large dropping of asbestos containing material must be picked up from scaffold boards and placed in the proper containers at the end of each day.

3. When the scaffold boards are free of as much asbestos material as can be picked up by hand, the boards must then be vacuumed with a wet vacuumer.

4. Protective clothing, as previously prescribed in the procedure must be worn while cleaning the scaffold boards.

R Disposal of Water Containing Asbestos:

1. The water from the wet vacuum operations must be emptied into a container (drum) and disposed of in the on-site waste water treatment facility at each location.



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2. The E/P Representative to be contacted for disposal at each site are:

   a. 511 - Technical Center -
      J. K. Petros Ext. 5209.

   b. 512 - Institute Plant -
      N. B. Martin Ext. 6482 or
      L. E. Patton Ext. 6228

   c. 514 - South Charleston Plant -
      EP Department Ext. 2799

   d. 380 - Sistersville Plant -
      D. R. Hienzman Ext. 1377 or
      Shift Coordinator Ext. 1448

3. If the asbestos contaminated water cannot be disposed of in the location (plant) waste water treatment facility, then the location Environmental Protection Department must be contacted for instruction as to how the contaminated water should be disposed of.

Training:

1. All Construction Department Employees shall be trained in the hazards of asbestos and the requirements of this procedure.

Supervisor(s) Report:

1. The Craft Supervisor responsible for the job shall complete a Supervisor's Report (Attachment A) for each job involving the removal and disposal of asbestos insulation.



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2. Upon completion of the report, the Supervisor shall (1) Send the original report to the Safety Department where it will remain on file and (2) make one (1) copy to be kept on file by the Supervisor. The Safety Department will provide 511 Industrial Hygiene and the Environmental Protection Department with a copy of each report.

R 3. The Craft Supervisor must notify the 511 Environmental Protection Department when demolition activities involve 260 liner feet or 160 square feet of asbestos material.

GENERAL REQUIREMENTS

1. The entire work area shall be considered a restricted area and shall be roped-off with yellow barricade tape sufficiently to protect all employees working in the general area from asbestos exposure.

2A. Warning signs shall be posted on all sides of the area to warn all employees of the asbestos hazard. These signs and the barricade tape shall remain in place until the job is completed.

2B. The warning signs shall read:

ASBESTOS
DUST HAZARD
AVOID BREATHING DUST
WEAR ASSIGNED PROTECTIVE EQUIPMENT



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2C. These signs and the yellow barricade tape are available in the site Toolroom and Construction Safety Supply.

3. All employees assigned to asbestos removal projects shall wear approved respiratory protective equipment.

4. All employees assigned to this type of job that are required to wear respiratory protective equipment must be trained in the proper use, care, and limitations of this equipment in accordance with the Technical Center Respiratory Protection Program. Also, any employee wearing respiratory equipment must meet the grooming guidelines specified in Procedure VIII, 8, "Wearing Apparel and Grooming".

5. Asbestos insulation must be wetted, prior to removal, and kept wet until disposal is accomplished.

A. If for any reason asbestos insulation cannot be wetted, then all employees assigned to that project shall be required to wear a fullfacepiece air-supplied respirator.

6. Asbestos insulation must not be dropped or thrown to the ground. It must be lowered to the ground by using a suitable container in order to prevent the creation of unnecessary dust.



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7. All asbestos insulation removed and related waste materials shall be placed in impermeable, labeled plastic bags. The caution label on the bag shall read:

CAUTION

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM

These bags are available in the site Toolrooms and Construction Storeroom at each location.

A. If for any reason these bags are not available, asbestos containing waste materials may be placed in any impermeable plastic bag as long as a caution tag is attached which states the same warning found on the asbestos disposal bags.

B. Plastic bags labeled "ASBESTOS" must be used for asbestos removal/disposal only.

8. No employees shall be allowed to leave the restricted (barricaded) area while wearing asbestos contaminated clothing.

9. Contaminated clothing shall be disposed at the end of each day or upon completion of the job if the job takes less than one day. This clothing shall always be disposed of in the proper disposable bags.



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10. Any re-usable equipment, such as, supplied air respirators which require cleaning ater each use, shall be placed in plastic bags and identified as contaminated before being taken to the Toolroom or Safety Supply for cleaning.

Monitoring:

1. A 511 Industrial Hygiene Representative shall perform monitoring on those projects involving the removal, clean-up, and disposal of asbestos insulation as determined necessary based on the information provided to them by the Craft Supervisor.

2. Monitoring will be performed to represent with reasonable accuracy the levels of asbestos exposure to all employees.

3. Monitoring reports prepared by 511 Industrial Hygiene will be issued to the Craft Manager, responsible Craft and Construction Superintendents, the Craft Supervisors, and the Safety Department.

4. Any employee involved in the removal, clean-up and disposal of asbestos insulation shall be given an opportunity to review his/her monitoring records when such a request is made through the Craft Supervisor.



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4B. If monitoring reveals that an employee has been exposed to asbestos over the OSHA allowable limit, that employee will immediately be notified of his/her exposure by their Craft Supervisor.

5. Monitoring data and reports shall be maintained by the 511 Industrial Hygiene Department.



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ATTACHMENT A

ASBESTOS INSULATION REMOVAL AND DISPOSAL
SUPERVISOR'S REPORT

1. LOCATION OF JOB: _____

2. DATE(S) JOB PERFORMED: _____ to _____

3. DESCRIPTION OF JOB: _____ to _____

_____

4. AMOUNT OF ASBESTOS INSULATION INVOLED: _____

_____

5. LOCATION ASBESTOS INSULATION DISPOSED: _____

_____

6. EMPLOYEES INVOLVED: (If more spaces are needed, use back of page)

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

7. TYPE OF RESPIRATORY EQUIPMENT USED: _____

8. CHECK IF INSULATION NOT WETTED DOWN: ☐

SUPERVISOR: _____

DATE: _____

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