



ASBESTOS PIPE COATING REMOVAL

Integrated Water Services, Inc.
(the Company)



Purpose

To provide information and instruction on the required precautions and protections for employees to avoid exposure to asbestos containing material when removing asbestos materials from pipe.

Scope

This program applies only to Integrated Water Services employees. Contractors who provide services that involve working with asbestos must do so using their own procedures.

When work is performed by a subcontractor on a company site, the contractor's written safety program shall take precedence for their employees. However, subcontractors may adopt this procedure for their use.

Key Responsibilities

Managers/Supervisors

- Prohibit Integrated Water Services employees or contractors from performing asbestos related tasks until they have been trained on this procedure.
- Ensure that all requirements of this procedure are understood and followed by those working under his/her direction.
- Perform duties of the competent person for asbestos work.

Competent Person

The competent person must make frequent and regular inspections of the job site, materials, and equipment. The competent person must be capable of performing or supervising the regulated area and have authorization to take prompt corrective actions to eliminate a hazardous condition or behavior.

All Employees

All employees and contractors are required to act in strict compliance with the requirements of this procedure and discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

Procedure

6 mil thick polyethylene sheeting must be placed under the pipeline at all times during coating removal to collect any debris generated.

Integrated Water Services will adequately wet the pipeline coating with an amended water solution using a low-pressure garden style sprayer or other similar device to prevent any visible dust emissions during the coating removal process.

A utility knife or similar tool may be used to cut the coating into uniform squares. The objective of this activity is to prevent tearing or crumbling of the coating and to remove it intact in a non-friable condition.

The company prohibits the use of high-speed abrasive disks and compressed air as a means by which to remove the coating. These work practices are prohibited by OSHA's Asbestos Construction standard and should not be performed under any circumstances as doing so greatly increases the risk of airborne asbestos fiber exposure.



Integrated Water Services or the independent contractor shall ensure the use of vacuum cleaners equipped with HEPA filters to collect all debris generated by coating removal. The Company is not obligated to provide vacuum equipment for contractors use, this is the responsibility of the contractor. Vacuum cleaners equipped with HEPA filters must be used to collect all debris generated by coating removal and to decontaminate disposable clothing of workers and supervisors in the designated area upon exiting the regulated area.

Regulated Area

Site preparation shall include proper signage. In addition to establishing a perimeter around the regulated area. Warning signs must be posted around the regulated area in a sufficient number to identify the hazard.

Integrated Water Services shall prohibit eating, drinking, or smoking in a regulated area. Workers within the regulated or designated area must not eat, drink or smoke. These activities must be conducted outside of these areas to prevent accidental inhalation or ingestion of airborne asbestos fibers.

All employees and contractors who perform work in regulated areas are covered by this procedure. Employees who perform housekeeping activities during and after construction activities are also covered by this procedure.

Respiratory Protection and Personal Protective Equipment

Proper PPE for asbestos workers must include but not be limited to respirators, full body disposable suits, safety goggles and gloves.

PPE must be worn by all who enter the regulated area. The respirator may not be required following collection of air monitoring data by a competent person who demonstrates that exposures are below OSHA's Permissible Exposure Limit. Integrated Water Services must demonstrate a negative exposure assessment within the last 12 months or state asbestos containing pipe coating removal projects are and will be below the permissible exposure limit.

The respirator shall be provided at no cost to the employee and shall be selected in accordance with the Company Respiratory Protection Program and shall be a NIOSH approved device. Powered, air-purifying respirators shall be available when requested by the workers performing the removal, or if the hazard assessment process requires this type of system. Contractors are responsible to provide their own respiratory protection, PPE, and associated equipment. Prerequisites for use of respiratory equipment, regarding asbestos, include:

- Successfully passing a respiratory physical
- Successfully completing annual respiratory protection training
- Successfully passing a respirator fit test

Waste Disposal

The adequately wet intact coating pieces should be placed into labeled asbestos waste bags. These bags should be air tight, puncture resistant, and labeled accordingly. These bags should only be half filled and closed at the end by a "goose-neck" method and sealed with duct tape.

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.



Bags or containers shall be imprinted and clearly labeled with the following OSHA asbestos hazard warning and address:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
Site Address
Contractor's Name
Contractor's Address

Bags/containers shall be clearly labeled, for DOT, as: RQ, Asbestos, 9, NA2212, PG III

Containers shall have a DOT number 9 diamond label on the container if the shipping container is greater than 66 pounds. For assistance with DOT labeling requirements, contact the Integrated Water Services Safety Director.

Proper disposal of asbestos waste including but not limited to proper vehicle labeling and waste shipment records. Sealed, secured, and labeled containers of ACM waste must be removed and transported to a pre-arranged disposal location as soon as technically feasible. Vehicles used for transport should be labeled properly during loading and unloading. A waste shipment record must be maintained.

Record Keeping

All records relating to any asbestos activity shall be maintained permanently by the company who performed the removal.

The following records shall be maintained:

- Exposure Assessments that are being relied upon to support a location's position that asbestos work (specific or generic) will not result in exposures above the PEL or excursion limit.
- Employee asbestos exposure records (personnel air monitoring).
- Medical Surveillance records.
- Training records.
- Shipping papers and disposal records.
- Copies of notification letters sent to Governmental agencies.
- Pre-project asbestos sampling results.
- Post-project clearance sampling results.
- Daily Work Summaries.
- Project Completion Closure Report, if provided.

Training

Employees removing the coating (asbestos workers) will have both classroom and hands-on training from an approved training provider.

Asbestos worker training must consist of both classroom and hands-on training from an approved training provider consisting of, but not limited to the following elements:



- methods of recognizing asbestos,
- health effects of asbestos,
- respirator training,
- requirements for posting signs and hands on training for acceptable removal methods.

A certificate of training shall be provided and maintained.