

	Burnt Mountain Services Safety Management System	Initial Issue Date	11/30/2023
		Revision Date:	Initial Version
ASBESTOS – CONTAINING PIPE COATING REMOVAL		Revision No.	0

## Purpose

To provide basic precautions and protections for employees to avoid exposure to asbestos containing material when removing materials from pipe.

## Scope

This program applies to all burnt Mountain Services (the Company) employees. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

## Key Responsibilities

### Managers/Supervisors

- Prohibit Company employees from working until trained to 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

A competent person will make frequent and regular inspections of the project. 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 hazard.

### All Employees


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

## Procedure

6 mil thick disposable polyethylene sheeting will be placed under the pipe during the duration of the asbestos coating removal project. 6 mil thick polyethylene sheeting must be placed under the pipeline at all times during coating removal to collect any debris generated.

The Company will utilize wet methods with amended water or Pam type cooking oil spray during the removal process. The Company will adequately wet the pipeline coating with an amended water solution or Pam type cooking oil spray using a low-pressure garden style sprayer or other similar device to prevent any visible dust emissions during the coating removal process.

The coating will be removed in such a fashion as not to make it friable asbestos. 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.

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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.

The Company shall ensure the use of vacuum cleaners equipped with HEPA filters to collect all debris generated by coating removal. 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 sufficient numbers to identify the hazard.

The Company 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 who perform work in regulated areas shall be 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 which demonstrates that exposures are below OSHA's Permissible Exposure Limit. The Company 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 employees and shall be chosen in accordance with the Company Respiratory Protection Program and shall be approved by NIOSH. Powered, air-purifying respirators shall be available when the employees choose to use this type or the hazard assessment process requires this type, or when the respirator will provide more adequate protection. 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**

Asbestos waste bags will be leak proof, airtight, puncture resistant and labeled in accordance with OSHA. The adequately wet intact coating pieces should be placed into labeled asbestos waste bags. These bags should be airtight, puncture resistant, and labeled accordingly. These bags should only be half filled and closed at the end by a "gooseneck" method and sealed with duct tape.

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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  
Burnt Mountain Services  
2517 1st Ave, Greeley, CO 80631  
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 Company Safety Manager.

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

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All records relating to any asbestos activity shall be maintained by the Company permanently.

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

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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.