Asbestos and RCF Management Plan

1.0 Purpose

The purpose of this procedure is to provide a system and instructions of how the Asbestos and RCF Management Plan is to be conducted at Hopewell Cogeneration Facility. In this way the Asbestos and RCF Management Plan will conform to a specific way of performing the activities related to the plan. The objective of this Management Plan is to allow the continuation of normal maintenance and service activities while limiting the potential exposure of maintenance workers, and outside service personnel to airborne asbestos fibers. The program's policies and work procedures have been specifically designed to meet the needs of both Hopewell Cogeneration Facility (HCF) and the community at-large.

This Management Plan is guided by four (4) specific policy statements:

1) Asbestos/RCF-containing materials identified at HCF facility are to be maintained under an Operations and Maintenance program to be instituted by the Environmental Manager. Members of HCF are expected to comply with this Management Plan relative to operations that they may undertake.

2) Under this Management Plan, to the extent that the objective of the Management Plan is not compromised, intact asbestos-containing materials (A/RCF CMs) will not be removed until a condition arises pursuant to Policy Statement three (3) below.

3) Instances and conditions which would motivate removal of some portion of the A/RCF CM in the facility include:

- When it is determined that A/RCF CM will be disturbed by repair, renovation or demolition activity; or
- Where a response to damaged A/RCF CM is necessary, and it is determined that removal is either the only acceptable response or the most cost effective response relative to all factors considered.

4) Repair is the minimally necessary response action to damaged A/RCF CM that is not removed.

Locations and approximate amounts of all identified A/RCF CM are detailed in the Asbestos Identification Survey Reports retained in the Asbestos and RCF Program Binder in the Environmental and Safety Office.

2.0 Applicability

ACM and RCFCM include, but are not limited to the following:

- **Thermal system insulation**—found on pipes, boilers, breeching, tanks and ducts.
- **Surfacing material**—sprayed-on or troweled-on materials such as acoustical plaster, fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, anti-sweat coatings, and other purposes.
- **Building/Construction Materials**—wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
- Electric cables, wires, and electrical equipment (arc chutes or insulators, etc.)
- Gasket materials

This program applies to all functions within GSENA operations.
This program conforms to all the applicable federal and state regulations and shall be adhered to by all affected company employees.

This program provides general guidance for managing asbestos related operations. Where applicable, additional plant specific work practices for handling asbestos-containing material must be consulted.

Applicable federal and state regulations must be followed even where specific function procedures do not exist.
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3.0 Reference Documents

Document Name
Asbestos and RCF Management Program Notebook
29 CFR 1910.1001
29CFR 1926.1101
GDF Suez Governance Rule
OSHA Respiratory Protection Standard - 29 CFR 1910.134.
USEPA National Emission Standards for Hazardous Air Pollutants 40 CFR Part 61-M
HCF Procedure H-01Refactory Ceramic Fibers (RCF)
GDF Suez North America SAF-001
40 CFR 763

4.0 **Responsibilities**

4.1 GSENA S&H:

- Maintain and update this policy and guidelines as necessary.
- Provide technical support to GSENA plants for S&H related concerns.

4.2 Location Manager

- Ensure compliance with all aspects of this policy.
- Ensure notification requirements per Federal and State regulations are met.
- Prior to beginning any repair, renovation or demolition activity, ensure that the affected area or equipment has been inspected and/or tested for potential RCFCM or ACM (ACM must be tested by by an accredited and licensed asbestos consultant).
- Maintain a data base of personal air monitoring results for company employees who perform asbestos related activities.
- Assist in the pre-approval process of contractors and/or consultants who perform bulk sampling and airborne evaluations for the presence of ACM or RCFCM.
- Assist in determining which employees are included in an Asbestos Medical Surveillance Program.
- Assist in the development, establishment, and adherence to work practices and personal protective equipment requirements specified by both federal and state agencies and company policies for plant specific asbestos operations.
- Evaluate work practices, compliance with federal and state regulations, and company safety and health policies of prospective asbestos abatement contractors.
- Ensure employee medical records are properly maintained.

4.3 Supervisor:

- Ensure compliance with all aspects of this policy.
- Ensure that asbestos related operations are carried out in compliance with all parts of this policy and all state and federal regulations.
- Ensure that all workers performing asbestos related operations are trained to the appropriate levels in order to perform assigned duties in a safe and healthy manner.

- Ensure all records, including employee asbestos training, air monitoring, and other data associated with determining exposures are maintained and readily available.
- Ensure that all asbestos containing material that has been abated is packaged according to federal and state requirements so as not to create hazards while awaiting transport to approved disposal sites.

4.4 Employees:

- Ensure that asbestos related operations are carried out in compliance with all parts of this policy and all state and federal regulations.
- When performing work activities around known or suspect ACM or RCFCM, ensure that caution is taken so no damage, disturbance or removal of the material occurs.
- Prior to beginning any repair, renovation or demolition activity, ensure that the affected area or equipment has been inspected and/or tested for potential ACM or RCFCM (ACM must be tested by an accredited and licensed asbestos consultant).
- Ensure that supervision is notified whenever known or suspect ACM or RCFCM is found to be damaged.
- Ensure that appropriate PPE is worn whenever working with or around ACM or RCFCM.

4.5 Contractors:

- All contractors performing asbestos associated operations must be trained, certified, and licensed according to applicable state and federal regulations.
- All contractors performing asbestos associated operations at GSENA plants are responsible for complying with all state and federal regulations concerning the removal, handling, transport, and disposal of asbestos containing material.

5.0 REQUIREMENTS

5.1 USE OF ASBESTOS & RCF IN GSENA PLANTS

The use of asbestos and/or RCF in new installations or during maintenance or refurbishment of existing installations is prohibited within GSENA. Spare parts or materials containing asbestos and/or RCF located in storerooms or in warehouses must be removed and replaced with non-asbestos or RCF parts and materials.

When removing RCF material from current installations, the material may be re-used with its intended purpose in same location as long as the work scope and its physical condition allow for it. Whenever the physical condition of the material or the work scope calls for the replacement of the RCF material, it must be replaced with a non-RCF material.

In rare situations, replacement with an RCF material may be necessary due to the availability of an alternative material. If this is occurs, a written formal statement and prior approval by the CEO is necessary.

Whenever asbestos is removed from its current installation, it must be replaced with a non-asbestos and non-RCF material, unless prior CEO approval is received.

5.2 IDENTIFICATION OF ASBESTOS & RCF

5.2.1 Identification of Asbestos Containing Material:

According to GR-02, Asbestos and Refractory Ceramic Fibers, each plant should conduct a **preliminary** plant survey by Dec 31, 2009 and a **definitive** plant survey by ***Dec 31, 2010*** to determine the presence, location and quantity of ACM and RCFCM and share these results with employees for the purpose of preventing an uncontrolled release.

The preliminary plant survey in an internal assessment is typically completed by knowledgeable plant employees based on Original Equipment Manufacturer (OEM) data, historical data and informal statements. The results of the preliminary survey are generally not considered definitive data, unless historical testing or factual documentation was used to obtain results. **(See Attachment 1)**

A definitive plant survey is a study performed by accredited experts and laboratory analysis. This study is based on systematic plant survey with specific material determinations made. The results of a definitive inventory are considered factual data and shall be used to develop the work plan and exposure controls. The definitive inventory must be updated at least every five (5) years.

In the ***absence*** of a definitive survey, each plant **must** consider **all** Thermal System Insulation (TSI), Surfacing Materials, Fire Proofing Materials, and many construction materials installed before 1980 as containing asbestos until it is inspected, sampled and analyzed by an Accredited and Licensed Asbestos Inspector and/or an Accredited Analytical Laboratory and determined not to contain asbestos.

In the absence of a definitive ACM & RCFCM inventory, a plant specific policy statement ***must*** be written stating that the plant will consider all suspect building materials as ACM until tested and verified by accredited professionals.

The plant specific policy statement must be communicated to all plant personnel and incorporated into the annual training matrix.

At a minimum, each plant shall complete a ***preliminary*** inventory to determine the presumed presence of ACM & RCFCM. This inventory **cannot** be relied upon as definitive data, thus requiring the testing and verification by accredited professionals to verify the presence of ACM prior to beginning any work or project involving suspect material.

Where practicable, material positively identified during the definitive plant survey should be clearly labeled as to indicate its contents.

5.3 WORK PLANNING

Prior to the start of any work assignment involving actual or suspected asbestos or RCF material, a pre-job assessment (work plan) must be completed to ensure all hazard controls have been identified and are appropriate for the work that will take place. At a minimum, the work plan should consist of the following topics:

a) Description of work or tasks to be performed;
b) A risk analysis, taking into account all specific circumstances of Asbestos or
RCF application:
   - structure of the material (solid, flocculated…)
   - frequency of exposure (sporadic, regular)
   - etc.;
c) Engineering controls– System(s) to be used that will prevent fibers from entering the worker's breathing zone
d) Workplace exposure controls – How will surrounding areas be affected by the work? What measures will be taken to ensure that workers in adjacent areas are not exposed to fibers? (Signage. Barricade, Tents, etc…)
e) Work methods and tools to be used
f) Industrial Hygiene Measures (monitoring strategy for airborne Asbestos or RCF concentrations)
g) Housekeeping & Hygiene
h) Emergency response procedures

5.4 ASBESTOS & RCF SAMPLING REQUIREMENTS

Prior to the collection of either an Asbestos or RCF sample, the plants definitive Asbestos & RCF inventory must be consulted to determine if the material has been positively identified. Any material not positively identified on the definitive inventory (or in the absence of a definitive inventory), the suspect material shall be considered to be asbestos until the material has been properly sampled and analyzed by accredited professionals. At no time shall an RCF sample be taken from any material that has ***not been positively identified as non-asbestos****.*

5.4.1 Asbestos Sampling

Any person collecting asbestos samples to determine the presence of ACM must be licensed and certified as an Accredited Asbestos Inspector.

Accredited Asbestos Inspectors shall have 24 hours of initial training with annual refresher training. Training shall be equivalent in curriculum content as that specified by the EPA's 40 CFR Part 763 Asbestos Model Accreditation Plan.

NOTE: *In many states, persons accredited as "asbestos consultants" (i.e., inspector, inspector/management planner, project designer and project monitor) must, in addition to possessing accreditation, be licensed by those states to perform those duties. Consult individual state regulations for licensing requirements.*

All laboratories performing bulk sample analysis and/or identification of asbestos-containing materials must be certified by the American Industrial Hygiene Association.

All asbestos samples shall be analyzed with polarized light microscopy (PLM).

5.4.2 RCF Sampling

If suspected RCF material is listed on the Asbestos & RCF inventory as non-asbestos, the material may be sampled using either an approved RCF test kit or by hiring a contractor to perform the sample. If a test kit is used, the manufactures instructions must be consulted to ensure an accurate test result.

If the suspected RCF material is listed on the definitive inventory as asbestos, **STOP**. The material is asbestos and cannot be removed or disturbed unless the worker has been properly trained, licensed and certified to perform such activities.

If the suspect material has not been clearly identified on the definitive inventory as either asbestos or RCF, **STOP**. The material **may** contain asbestos and specific training, licensing and certification is required to perform this activity. Unless a plant employee is a licensed and certified **Asbestos Inspector**, the sample must be contracted out.

5.5 REGULATED AREAS

Regulated areas are locations within a plant or facility where airborne asbestos concentrations in excess of the PEL or excursion limit. Typically, this is an area where Class I, II or III asbestos work is taking place. Regulated areas must be demarcated from the rest of the workplace to minimize exposure and access to these areas must be limited to authorized persons only.

Under normal operating conditions, GSENA does NOT have any areas meeting the definition of a Regulated Area. If a plant assessment, survey or work activity determines that a regulated area exists, the plant will notify its workers by a combination of signage, verbal and written notification to ensure that all workers are aware of the hazard.

All persons entering a regulated area where employees are required to wear respirators shall be supplied with a respirator that is appropriate for the exposure.

No food, drink, tobacco or gum is allowed in the regulated area.

All asbestos work performed within regulated areas must be supervised by a competent person.

5.6 GSENA ASBESTOS WORKER TRAINING

GSENA employees will ***not*** perform asbestos ***abatement*** work as part of their general work assignments. At times, an employee's job assignment may require them to work with or around ACM. Prior to being assigned work with ACM or around ACM which may be disturbed as part of their work assignment, appropriate asbestos training must be conducted.

5.6.1 Awareness Training

All workers who work in a building that contains ACM, whether or not they are required to work with ACM, shall receive annual asbestos awareness training. The awareness training will include:

- Information on asbestos—its form, uses, and health effects associated with exposure
- Locations of ACM and potential ACM in the facility
- Recognition of damage, deterioration, and delaminating of ACM

- Regulatory requirements relating to housekeeping
- The proper response to fiber release episodes
- Name and telephone number of asbestos designated contact
- Contents of 29 CFR 1010.1001

5.6.2 **Operation and Maintenance Level Training**

Any service or maintenance worker who conducts work activities resulting in the disturbance of ACM shall receive 16 hours of training. The 16 hours of training includes awareness training as well as instruction on the following:

- Description on proper methods of handling ACM
- Information on use and hands-on training in the use of respiratory protection, other personal protection measures, and good work practices
- Provisions of 40 CFR 763.91 (Operation and Maintenance), its Appendices, and 40 CFR 61 (NESHAP).

5.7 ASBESTOS ABATEMENT NOTIFICATION

Some state regulations require that notification to state agencies be made 10 days prior to starting any asbestos abatement related (removal, encapsulation or enclosure) work. In some situations, emergency work is exempt from the *10 day notification period*; however, *verbal notification* to state agencies is required before beginning the emergency work. Additional documentation may be required to be provided upon starting the emergency work. Refer to your individual state requirements to determine the proper notification procedures.

When contractors are used to perform asbestos abatement activates, the plant is responsible for ensuring that the contractor has made all necessary notifications prior to the commencement of the work.

5.8 INITIAL ASSESSMENT & EXPOSURE MONITORING

Prior to the start of asbestos related operations a "competent person" shall perform an initial exposure assessment of the operation to determine expected employee exposures. The assessment provides necessary information to ensure compliance with the asbestos standard. It also assures that the exposure control systems are appropriate for the operation.

Whenever asbestos operations are performed by GSENA employees, the plant manager or designee is responsible for coordinating representative personal exposure monitoring for airborne asbestos and maintaining these records.

Determinations of employee exposure shall be made from breathing zone samples that are representative of the 8-hour TWA and 30-minute-short-term exposures of each employee.

In some states, the exposure monitoring activity must be performed by an individual **not** representing the asbestos workers. Prior to assigning asbestos operations requiring exposure monitoring, ensure that all state requirements are being met.

Within 15 days after the receipt of any exposure monitoring results performed under the standard, GSENA will notify the affected employees of these results in writing either individually or by posting of results in an appropriate location that is accessible to affected employees.

Written notification shall contain the corrective action being taken by GSENA to reduce employee exposure to or below the TWA and/or excursion limit whenever results indicate that the TWA and/or the excursion limit have been exceeded.

5.9 ASBESTOS & RCF EXPOSURE CONTROLS

5.9.1 Asbestos

Engineering controls, appropriate work practices, and personal protective equipment shall be used when working with asbestos-containing material to minimize employee exposure to levels as low as feasible and below the OSHA Permissible Exposure Limit (PEL) which is 0.1 fibers per cubic centimeter (f/cc).

GSENA shall implement engineering exposure controls in accordance with OSHA Standard 29 CFR 1926.1101, 29 CFR 1910.1001, and applicable state requirements where employee exposure has the potential to exceed the OSHA permissible Exposure Limit (PEL) or Excursion Limit, or when representative personal air monitoring has demonstrated that exposures exceed the PEL or Excursion Limit.

When engineering controls and work practices are not sufficient to reduce employee exposure to or below the TWA and/or excursion limit, GGSENA shall use them to reduce employee exposure to the lowest levels achievable by these controls and shall supplement them by the use of respiratory protection that complies with the individual plant respiratory protection program.

5.9.2 RCF

Prior to working with and RCF material, the ***Material Safety Data Sheet (MSDS) must be consulted*** to ensure that all necessary engineering controls, appropriate work practices, and personal protective equipment are being used to contain material and minimize employee exposure to levels as low as feasible and below the **Recommended Exposure Guideline (REG)** of 0.5 fibers per cubic centimeter (f/cc), which calculates out to approximately 4.2mg/m^3.

Note: *To date, OSHA regulates RCF under a general duty category of "particulate not otherwise regulated" with an exposure of 5mg/m^3 for respirable dust and 15mg/m^3 for total dust.*

GSENA shall implement these controls in accordance with the Recommended Exposure Guideline and OSHA requirements when employee exposure has the potential to exceed, or when representative personal air monitoring has demonstrated that exposures exceed the PEL or Excursion Limit.

When engineering controls and work practices are not sufficient to reduce employee exposure to or below the REG or the OSHA PEL limit, GSENA shall use them to reduce employee exposure to the lowest levels achievable by these controls and shall supplement them by the use of respiratory protection that complies with the individual plant respiratory protection program.

5.9.3RCF Changes During Temperature Exposure

RCF fibers undergo partial conversion to cristobalite (form of crystalline silica) after exposures to temperatures exceeding 1800°F for a long period of time. Prolonged or repeated inhalation of respirable crystalline silica dust may aggravate existing lung illnesses.

Prior to beginning work with RCF containing material, perform a pre-job assessment to determine if the RCF at the work location has been exposed to temperatures in excess of 1800°F.

If it is determined that temperatures exceeded or potentially exceeded 1800°F, stop and consult the work practices for ACM to determine <u>appropriate engineering and exposure control measures</u>.

5.9.4 Asbestos and RCF Engineering Controls

Use of wet methods during ACM or RCFCM material abatement and clean-up.

Use of High Efficiency Particulate Air (HEPA) filtered vacuum systems when performing cleanup operations.

Prompt cleanup and disposal of ACM and RCFCM and debris is recommended. During abatement activities, cleanup of asbestos containing materials at end of the work shift is mandated by OSHA.

HEPA filtered local exhaust and dust collection systems shall be designed, constructed, installed and maintained in accordance with good practices such as those found in the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, ANSI Z9.2-1979.

Use of enclosures while performing Class I, II, and III asbestos operations (i.e., negative pressure enclosures and glove bags).

Use of directed ventilation during asbestos operations.

Use of indirect heat to remove floor tiles.

Limit the use of power tools unless in conjunction with local exhaust. The use of hand tools is preferred.

Personal Protective Equipment and Hygiene Practices

- Respirators shall be selected and used in accordance with the individual plant Respiratory Protection Program and OSHA guidelines for respirator selection.
- Smoking, eating, drinking, chewing, and applying cosmetics in asbestos work areas is prohibited.
- Asbestos and RCF work areas must be properly demarcated and posted with appropriate DANGER sings prior to and during work activities.
- Compressed air shall be avoided to remove asbestos or RCF materials unless used in conjunction with a ventilation system that effectively captures the dust cloud created by the compressed air.
- Wear appropriate full body protective clothing (Tyvek suit, hard hat, eye protection, work gloves).
- If work clothing is taken home, vacuum your clothes with a HEPA filter vacuum prior to leaving the work area.
- Wash contaminated clothing separately from other clothing. Rinse the washer after use.

5.10 MEDICAL SURVEILANCE

Any employee who for a combined total of 30 or more days per year performs Class I, II, or III asbestos operations, or who is exposed to airborne asbestos fibers above the PEL shall be included in a medical surveillance program in compliance with 29 CFR 1926.1101.

A medical exam will be given within 10 working days following the 30th day of exposure, and at least annually thereafter.

In addition, any person **required** to wear a respirator and, those employees whose work activities are regulated by 29 CFR 1910.1001 shall be included in a medical surveillance program.

Refer to the individual plant respiratory protection program for all medical exam frequency requirements

5.11 ENVIRONMENTAL CONTROLS & WASTE DISPOSAL

All Class I, II, and III asbestos operations shall be performed within containments constructed to prevent the release of airborne asbestos fibers, unless approved by the GSENA S&H. All asbestos containing material, waste and debris should be properly wetted during removal and clean-up.

All asbestos-containing material, waste, and debris which includes but is not limited to contaminated clothing shall be transported in sealed impermeable doubled bags, or other closed containers and labeled as follows:

All asbestos-containing material, waste and debris shall be disposed of as regulated waste.

For specific information regarding the handling and disposal of asbestos containing material is needed, please contact your local Environmental Coordinator.

5.12 CONTRACTOR REQUIREMENTS

All contractors performing asbestos associated operations must be trained, certified, and licensed according to applicable state and federal regulations.

All contractors performing asbestos associated operations are responsible for complying with all state and federal regulations concerning the handling, transport, and disposal of asbestos containing material.

Contractor compliance must be monitored by a licensed "Project Monitor."

All contractors performing asbestos operations must comply with OSHA 29 CFR 1926.1101 and 1910.1001.

6.0 RECORDKEEPING REQUIREMENTS

Each GSENA plant shall maintain the following recordkeeping requirements:

- Hazard Assessments
- Asbestos & RCF Survey Records
- Industrial Hygiene Monitoring Results
- Asbestos Permits and Abatement Documents
- Medical Surveillance Information
- Employee Training Records

Employee personal air monitoring records shall be maintained by the GGSENA plant for at least thirty (30) years.

Employees subject to medical surveillance shall have their records maintained by GGSENA for the duration of employment, plus thirty (30) years.

Employee training records shall be maintained by GGSENA for one (1) year beyond the last date of employment.

All Asbestos survey records shall be updated and maintained as necessary to reflect changes when abatement work has been performed.

7.0 Introduction

This Asbestos and RCF Management Plan was developed in accordance with the United States Department of Labor, Occupational Safety and Health Administration's (OSHA's) Asbestos Standards [29 CFR 1910.1001, 29 CFR 1926.1101].

These regulations place a burden of asbestos management on the owners and operators of facilities that may contain asbestos-containing materials (A/RCF CMs), as well as employers whose employees may be expected to work near or with A/RCF CMs. As the University is both a facility owner and an employer, it has responsibilities in both aspects of the Standards. These responsibilities include identification of potential asbestos exposure hazard, notification of employees and occupants of the presence of asbestos or RCF containing material (A/RCF CM), employee awareness and operational training, recordkeeping, and management of renovations and maintenance operations.

In general, the management plan development process consisted of:

- A review of available documents, such as blueprints, construction specifications.
- A visual inspection of building areas and elements to locate suspect A/RCF CM; sampling of suspect A/RCF CM as required; and assessment of the physical condition of the A/RCF CM.
- Analysis of the collected samples to confirm the suspected material as A/RCF CM.
- Meetings with the designated representatives of Hopewell Cogeneration Facility (HCF) to discuss prioritization of confirmed A/RCF CM areas relative to the asbestos management philosophy for the subject facility, resources, schedule, and building specific issues.
- Assignment of required and appropriate response actions for all A/RCF CM identified.
- Development of an Operations and Maintenance Program to institute appropriate controls for the management of A/RCF CM remaining in-place.

This plan is based on inspections conducted on the dates indicated. Condition assessments and subsequent assigned response actions of A/RCF CM identified are based on the conditions at the time of the inspection. All of this material will be kept in the Environmental & Safety Office in the Asbestos and RCF Program binder.

8.0 Definitions

"Accredited Inspector" means a person who has completed a course at a USEPA approved training facility in the inspection of buildings for Asbestos-Containing Materials, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).

"Accredited Management Planner" means a person who has completed a course at a USEPA approved training facility in the management of Asbestos-Containing Materials in buildings, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).

"Accredited Asbestos Abatement Project Designer" means a person who has completed a course at USEPA approved training facility n the design of asbestos abatement projects, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).

"A/RCF CM" means Asbestos and RCF-Containing Material.

Class I Asbestos Work: Activities involving the removal of Thermal System Insulation (TSI) and surfacing material.

Class II Asbestos Work: Activities involving the removal of ACM that is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III Asbestos Work: Repair and maintenance operations, where "ACM," including thermal system insulation and surfacing material is likely to be disturbed.

Class IV Asbestos Work: Maintenance and custodial activities during which employees contact ACM or PACM and activities to clean up waste and debris containing ACM and PACM.

“CMU” means concrete masonry unit.

Competent Person: An individual who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure, and who has the authority to take prompt corrective measures to eliminate them. The competent person shall possess a level of training equal to or higher than the operation he/she has been assigned to supervise.

Definitive Asbestos Survey: A systematic plant survey conducted by accredited experts and laboratory analysis to positively identify the location and amount of ACM in a plant or building.

Disturbance: Contact which releases fibers from asbestos containing material or generates debris containing asbestos. Disturbance includes cutting away small amounts of ACM or PACM, no greater than the amount which can be contained in one standard size glove bag or waste bag in order to, access a building component.

“EPA” means the United States Environmental Protection Agency.

Excursion Limit: Airborne concentration of asbestos as averaged over a sampling period of thirty (30) minutes, which shall not exceed 1.0 fiber per cubic centimeter of air (f/cc).

Glove Bag: A 60 x 60 inch impervious plastic bag-like enclosure affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled.

“HEPA filter” means High Efficiency Particulate Absolute filter.

“HRSG” means Heat Recovery Steam Generator.

Initial Exposure Assessment: An exposure assessment conducted by a competent person immediately before or at the initiation of an operation to determine expected exposures during that operation.

"NIOSH" means the National Institute of Occupational Safety and Health.

"OSHA" means the United States Department of Labor Occupational Safety and Health Administration.

Permissible Exposure Limit (PEL): Eight (8) hour time-weighted average (TWA) that shall not exceed 0.1 fibers per cubic centimeter of air (f/cc).

Preliminary Asbestos Survey: An internal plant survey based on OEM data, historical data, informal statements, etc… which are used to assume the location of ACM

Regulated Area: Area established to demarcate areas where Class I, II, and III asbestos work is conducted.

Thermal System Insulation: ACM applied to pipes, fittings, boilers, breeching, ducts or other structural components to prevent heat loss or gain.

"USEPA" means the United States Environmental Protection Agency.

"VDOL" means the Virginia Department of Labor.

9.0 Program Management

Program Management shall originate from the Plant Manager, the Plant Manager shall delegate, as necessary, oversight and review of the Plan to appropriate personnel and consultants. The Site Environmental Representative will normally handle all the duties.

The Manager may delineate specific buildings with no identified A/RCF CM and conditions which preclude the potential presence of concealed suspect material to be exempt from the requirements of this Management Plan. A copy of this exemption must be included in the Management Plan. Presently there are none.

10.0 Notification of Employees or Contract Labor

Anytime anyone other than HCF employees is required to conduct maintenance type activities in areas of known A/RCF CM (such as outside contractors, Alstom workers, etc.):

- they shall be notified of the location of the A/RCF CM in the building and any special precautions required, and;
- a person designated by the Plant Manager shall be notified of their presence in the building or equipment and their intended activities.

Notification to the workers may be in the form of reading of this Management Plan, or by other written information that as a minimum includes the type and/or location of A/RCF CM in the buildings or equipment, and any special precautions required.

Notification to the designated person of the presence and intended activities of the outside workers shall be made by appropriate plant personnel prior to the workers beginning their activities so that a determination of whether the activities will disturb A/RCF CM can be made. The designated person shall then release the workers to proceed and document the release, any specific instructions, and evidence of the worker's notification. The Environmental Manager shall maintain such documentation.

Plant employees who may contact A/RCF CM as part of their regular assigned duties shall participate in an in-house awareness training program.

11.0 Emergency Situations

In the event that emergency responses are required, a person designated by the Manager (usually the Environmental or Maintenance Supervisor) shall be contacted by telephone and may direct responses by telephone. Written documentation of the emergency and response must be completed within 24 hours of the initial telephone contact and forwarded to the Plant Manager.

Normal Incident reporting will apply in this case.

12.0 Plant Awareness

The Plan will be available in the Environmental and Safety office 24 hours a day. Plant employees, as appropriate, shall receive awareness training pursuant to the OSHA Standard. Reinspection and assessment of the Plant and this Plan shall be performed periodically (5 years) to review the condition of A/RCF CM being maintained in-place.

13.0 Asbestos and RCF Abatement

Asbestos is present in a wide variety of building materials. Any home or building owner may encounter an asbestos-containing material (ACM) during the course of renovation, repair or demolition. Asbestos-containing material and/or RCF can include insulation, plaster, floor or ceiling tiles, plaster, ductwork, roofing shingles, adhesives, and a host of others (EPA, 2007).

Virginia (VA) Asbestos Removal & Abatement Resources:

In the state of Virginia, the Virginia Department of Labor and Industry (DOLI) regulates asbestos abatement and removal through enforcement of the Virginia Occupational Safety and Health (VOSH) regulations, enforcement of the Environmental Protection Agency's National Emission Standards for Hazardous Air Pollutants (NESHAPS), and

enforcement of the Asbestos Notification regulations found in the Labor Laws of Virginia (§40.1-51.20).

The Virginia Department of Professional and Occupational Regulation (DPOR) are responsible for all company and individual licensure in Virginia. The Virginia Department of Environmental Quality is responsible for the regulation of landfills in Virginia. The state of Virginia draws a distinction between friable and non-friable asbestos, and defines friable asbestos as material that can be crumbled through normal hand pressure. The Virginia DOLI has taken steps to protect workers and the public against asbestos contamination through the release of fibers into the air from friable asbestos.

Asbestos Abatement Guidelines

An owner or operator planning the abatement or removal of asbestos containing material must notify the Virginia DOLI. Under Virginia regulations, a notification is required for any asbestos abatement project greater than ten linear or ten square feet. Notifications are also required for essentially all demolition projects, regardless of whether asbestos containing materials are not present in the structure.

A notification is not required for non-friable asbestos containing material, roofing, flooring and siding materials which when installed, encapsulated or removed do not become friable. If the material is in good shape and removed using OSHA's compliant work practices, then notification is not generally required. If the material is not in good shape, the matrix binding the asbestos fibers has deteriorated, or mechanical means are used to remove the material, resulting in more than incidental breakage, then notification is required. Activities such as grinding, mechanical chipping, sawing or drilling can render the asbestos containing material friable, and would require notification. Demolition of residential structures that do not meet the NESHAPS definition of facility does not require notification.

Any asbestos abatement or removal project must submit a notification form to the Virginia DOLI. An asbestos project permit fee must be submitted with the completed project notification for non-residential structures. Notification of an asbestos abatement or removal project must be received by the DOLI within 10 working days of the start of the project. The DOLI will generally issue the permit within seven working days of the receipt of the completed notification form and permit fee. The notification does not become effective until a complete form is submitted and the proper permit fee is enclosed with the completed form or the credit card payment has been approved. An amended notification must be submitted when certain information on the asbestos form is changed.

A complete waiver of the 20-calendar or 10-working day reporting period may be granted only under conditions constituting an emergency involving protection of life, health or property, including but not limited to: leaking or ruptured pipes; accidentally damaged or fallen asbestos that could expose non-asbestos workers or the public; unplanned mechanical outages or repairs essential to a work process that requires asbestos removal and could only be safely removed during the mechanical outage. The notification and any applicable fees must be submitted within five working days after the start of the

emergency abatement. A detailed description of the emergency must be included when filing an emergency notification.

A partial waiver of the reporting period may be granted if there are circumstances that prevented the timely notification of this project and specific hardships which are created by the required reporting period. A detailed statement signed by the facility owner explaining such circumstances should accompany the notification. The statement should include dates the project was planned, dates the facility was inspected and any pertinent information on the inspection process. Any request based on financial hardship must include a complete financial statement outlining all financial aspects. If notifications are required to be sent to EPA, copies of any waiver requests should be attached to those notices.

Blanket notifications can be submitted for large-scale projects of a long duration at a single site. They are not to be used for the purpose of having an abatement contractor on call. The contractor must be engaged in an asbestos project on every workday during the notification period, excluding weekends and holidays. It does not include re-insulation of the pipes or any other non-asbestos related construction activity at the site.

These projects must also be at one site, such as a large industrial plant or an office building under renovation. Blanket notifications including multiple addresses will be accepted only where the addresses are contiguous and are under the same ownership. An example of this would be a large apartment complex where work will be done in each building. For these you must submit a work plan for the site that includes when each building will be done.

A blanket project may last no longer than one year. If the project extends longer, the owner or operator must submit another notification for the remaining period. If there is a break in the work, the asbestos contractor is required to amend the notification to show the period when the activity was suspended.

A phased notification may be used for large renovation projects that must be broken up in pieces to allow other non-abatement contractors time to work between the abatement periods. This type of project requires that the work must be performed in a single building, and the length of the project cannot exceed one calendar year. All phases of a large renovation project that involves asbestos containing material must be bid as a single project, and there can be no more than five separate phases. The dates and times for the phases must be clearly defined in the project bid notification. If the project is to run longer than one year, or have more than five phases, a separate notification must be submitted for the excess amounts.

Improper notification to the Virginia DOLI of any asbestos and or demolition project as well as failure to amend any revisions to the project dates and other required information on the original notification form may result in citations and monetary penalties.

'Virginia (VA) Asbestos Removal & Abatement Resources' Sources:

- "Frequently Asked Questions: Virginia's Asbestos Regulations" Virginia Department of Labor and Industry. 19 Nov 04. 27 Jan 08 .http://www.doli.virginia.gov/whatwedo/lead_asbestos/leadasb_faq.html

Many buildings contain asbestos and/or RCF, which was used in spray-applied flame retardant, thermal system insulation, and in a variety of other materials. Asbestos and/or RCF was sometimes "flocked" above false ceilings, inside technical ducts, and in many other small spaces where firefighters would have difficulty gaining access. Structural components like asbestos and/or RCF panels were also used. In residences, asbestos and/or RCF was often a component of a type of flocked acoustic ceiling called "popcorn ceiling" or "cottage cheese ceiling", until its production was banned in the U.S. in 1978. RCF is still being used today for extreme high temperatures. However, the ban allowed installers to use up remaining stocks, so houses built as late as 1986 could still have asbestos in their acoustic ceilings. The only way to be sure is to remove a sample and have it tested.

14.0 Labeling of Asbestos or RCF Material

The location of any A/RCF CM in routine maintenance areas (such as boiler, etc.) shall be marked with warning labels affixed immediately adjacent to, or directly upon, the A/RCF CM, as appropriate Labeling shall be in accordance with the OSHA Standard for General Industry, 29 CFR 1910.1001. If there is an area that is suspect but not proven it shall be treated as if it were asbestos or RCF until proven otherwise.

15.0 General Work Practices

It is not the policy of HCF or GDF Suez to handle or work with Asbestos or RCF. Contractors shall be called in when repairs are need. But if in the course of maintenance or normal activities or general work practices, including but not limited to, handling of asbestos; cleaning of adjacent surfaces and materials; personal protection and hygiene; and isolation of work areas shall be in accordance with the OSHA Standards. Specific instructions and work practices shall be in accordance with the Specific Instructions and Work Practices section of this Program.

Engineering controls such as, but not limited to, isolation, enclosure, local exhaust ventilation, and dust collection shall be used during response action activities. Local exhaust and dust collection systems shall utilize High Efficiency Particulate Absolute (HEPA) filters manufactured for use with asbestos particles. All hand-operated and power-operated tools which may produce or release fibers shall be equipped with local HEPA-filtered exhaust systems.

Specialized equipment and supplies, such as but not limited to, HEPA filter equipment, and respiratory and personal protection equipment shall be commercially available equipment and supplies manufactured for their intended use.

16.0 Safety Precautions for the Removal of Asbestos and RCF

The best safety precaution you can take when removing asbestos and RCF is to hire trained professionals do the job. This can hardly be overstated; not only is asbestos and RCF a highly toxic and insidious substance (meaning fibers can enter the atmosphere and float around for months undetected), if you attempt removal on your own, *you bear all legal liability.* Not only have professional asbestos and RCF abatement workers been trained in the proper handling of asbestos and RCF, the company is also licensed, insured and bonded. If anything goes wrong, it is the insurance company that must ultimately cover any claims.

Step One: Containment

The first thing that must happen is the construction of a proper containment area. This happens in the part of the house from which asbestos and RCF is to be removed. The procedure varies depending on where the asbestos and RCF is actually located, but involves covering non-contaminated surfaces with heavy sheets of polyethylene plastic, fastened with duct tape. If applied to the floor, this sheeting must be no less than 6 mil in thickness, and will need to be applied in two layers. For walls and ceilings, 3 mil is sufficient. The first layer is placed on the floor and attached to the walls; plastic sheets are then hung from the walls and/or ceiling except in the areas from which asbestos and RCF is to be removed. Finally, a second layer is placed loosely on the floor.

In addition, you will need to build an "airlock" at the entrance/exit of the room or space. In addition to hanging sheets of plastic on either side of the door frame (cutting vertical slits for entering and exiting), there will need to be flaps on each side, *plus* an outside compartment made from framing lumber and sheets of polyethylene. This will constitute the "airlock," where contaminated clothing and equipment is left and discarded.

It is important to keep everything wet using a water sprayer; this will keep asbestos and RCF fibers from becoming airborne.

Step Two: Protective Gear

At the minimum, you will need disposable coveralls (with built-in booties and hood), a half-face respirator with dual HEPA cartridges, vented, non-fogging goggles or other eye protection, several pairs of rubber gloves, soft, pull-on rubber boots so as not to tear the plastic sheeting protecting the floor.

Step Three: Disposal

Regulations in most states require that asbestos and RCF waste be disposed of in 6 mil plastic "zip-lock" type bags that are clearly marked as an asbestos and RCF hazard. These bags measure 30" by 50," and can be purchased at any store that specializes in industrial safety equipment. Once filled and "zipped," the top of the bags should be folded over and sealed again with duct tape.

Once asbestos has been removed from a location, federal regulations dictate that such waste be disposed of in an approved manner, either in special 6 mil plastic bags that have "zip-lock" type fasteners and are sealed with duct tape, or in sealed, 55 gallon drums designed for this purpose.

The rules and regulations regarding asbestos waste disposal vary according to several factors, including the percentage of actual asbestos and what other chemical and/or toxic substances may be present. Local and state regulations also have some bearing on the issue.

Different Types of Asbestos Waste

Friable asbestos material is any substance that contains more than 1% asbestos and can be crumbled or pulverized by hand when dry. If it *cannot* be crushed by hand, it is considered *non friable.*

Packing, gaskets, floor covering and asphalt roofing containing more than 1% asbestos is classified as *Category I non-friable asbestos-containing material.* Anything outside of these products that cannot be crushed and pulverized by hand is considered *Category II* (non-friable).

Any asbestos product that is friable is considered *Regulated Asbestos-Containing Material.* This includes products listed above that has or may become friable due to age and exposure or mechanical action such grinding, sanding, cutting, etc.

Asbestos-containing waste materials consist of materials that contain asbestos or have become contaminated with asbestos in the course of demolition or renovation projects. This includes any disposable equipment and protective clothing.

Preparing ACM Waste for Transport

Any potentially friable asbestos-containing materials must be kept wet in order to keep fibers from becoming airborne. It is in this state that they will be packaged for transport to a disposal facility.

All asbestos-containing material (ACM) waste must be placed in approved, marked containers. Smaller amounts are contained in special sealable plastic bags; in addition to being "zipped," these bags must also be sealed with duct tape. Large amounts must be sealed inside plastic 55-gallon drums made for this purpose.

Any vehicle used to transport ACM waste must have identifying markings during loading and unloading, and all containers of ACM waste must be labeled with the name of the waste generator as well as the location from which it is coming.

Paperwork

A Waste Shipment Record (WSR) must be given to the operator of the disposal facility, who must then insure that the amount of waste indicated on the WSR matches the amount actually delivered. Any discrepancies are reported to the state agency (usually the department of environmental quality, or DEQ) to which the initial report of the removal project was made. In addition, a copy of the WSR must be returned to the waste generator within 35 days; if not received within 45 days, the waste generator will need to file a report with the state DEQ.

Information regarding authorized disposal sites and regulations regarding asbestos disposal can be obtained by calling the Environmental Protection Agency Ombudsman at 1-800-368-5888.

It should be noted that private homeowners are not generally subject to the regulations outlined above; however, these regulation are in place for the good of public safety. If you are a homeowner and need asbestos removed from your home, it is always best to have it done by a qualified professional. Otherwise, the best course of action is to follow the regulations and procedures above.

17.0 Site Specific Instructions for Known or Suspected Areas

The only suspected area at HCF is the insulation between the inner and outer skin of the HRSG's. When doing daily inspections of the plant; if there is an opening on the outside skin of the HRSG, it is to be in-capsulated and clad welded until a complete rebuild is required. Upon entering the hot gas path of the HRSG at the gas turbine end; the skin is to be inspected as soon as the air checks are completed satisfactory. If there are any breaks or openings the skin (enough to allow insulation to escape), no work will be allowed until the area is sealed up.

18.0 PERSONAL PROTECTIVE CONTROLS

Personnel involved in work with A/RCF CM shall use, as a minimum, the following personal protective equipment and procedure:

- An appropriate respirator
- Disposable protective clothing
- Personal decontamination

19.0 MEDICAL EXAMS AND RESPIRATORY PROTECTION PROGRAM

4.1 Should any of HCF employees be trained to complete short duration response actions, the Plant Manager shall establish a Respirator Program pursuant to the OSHA Respiratory Protection Standard 29 CFR 1019.134.

20.0 TRAINING PROGRAMS

All employees whose work requires them to come into contact with or handle A/RCF CM shall be furnished with a minimum of fourteen hours of Operations and Maintenance Training, including specific work practices and safety procedures. Contractors are to be used at all times, and they must have attended training. Training shall be provided prior to or at the time of initial assignment and at least annually thereafter. Operations and Maintenance Training shall be provided by a qualified training agency.

All employees who perform housekeeping operations in an area which contains A/RCF CM shall be provided an asbestos/RCF awareness training course, which shall at a minimum contain the following elements: health effects of asbestos, locations of A/RCF CM in the building, recognition of A/RCF CM damage and deterioration, and proper response to fiber release episodes. Each employee shall be trained at least once a year.

All outside contractors working in an area of where A/RCF CM is located will be notified of the presence of the A/RCF CM and will be required and responsible for the appropriate level of training for their employees. Contractors must be able to provide verification that their workers have been trained regarding the proper handling of A/RCF CM.

At the date of plan implementation, the Plant Manager is to utilizing the services of a Virginia-licensed asbestos abatement contractor to perform all O & M procedures.

21.0 PERIODIC INSPECTIONS

At least every five years beginning with the implementation of this Management Plan, all areas where A/RCF CM has been identified shall be reinspected for changes in its condition. The reinspection shall be conducted by a person with adequate training. Results of the periodic surveillance shall be forwarded to the Plant Manager and his designee for inclusion into this Management Plan.

22.0 INSPECTION CONTROL

The Plant Manager/Designee is responsible for maintaining records sufficient to indicate when reinspections are required and for making the necessary arrangements for the reinspections to be conducted by accredited inspectors.

23.0 MANAGEMENT PLAN UPDATES

Should reinspections result in changes of any kind to be made to this Management Plan, those changes may be made by an in-house inspector or an accredited management planner, or the reinspection results may be reviewed by an accredited management planner, and evidence of that review maintained by the Manager.

24.0 SPECIAL INSPECTIONS

Renovation and/or demolition projects shall motivate reinspection of certain spaces and/or invasive inspection of such spaces as the HRSG's cores and columns. The Manager shall utilize the services of an accredited inspector for all inspections.

25.0 Electronic Location of this Plan

\\Hcf-fileserver\company\Public\EMS\Procedures\A-50 Asbestos & RCF Management Plan.doc

26.0 Distribution List:

22.1 Copy in the Asbestos and RCF Binder held by Jeff Huise
22.2 Copy in the Asbestos and RCF Training Notebook located in the Control Room
22.3 Electronic Copy found Z:\Public\EMS\Procedures\A-50 Asbestos &RCF Management Plan
22.4 Tab 16 of the EMS Manual

27.0 Program Revisions

This plan is to be updated at least every 5 years, or if there is a change in the plant such that this plant will be required to be revised. If new instructions are issued by GDF Suez, they are to be implemented into this plan. If new regulations are issued by either OSHA or the Commonwealth of Virginia they too will be placed into this plan.

Revision or Update	Revised by	Remarks	Date
Original Plan	Chuck Barnes	Plan was implemented because of possible RCF in the HRSG's	3/26/2010
Update it incorporate GDF Suez SAF-001	Chuck Barnes	Took the original HCF plan and added items from the SAF-001	5/20/2010

Preliminary Asbestos and Refractory Ceramic Fibers (RCF) Questionnaire

The following questionnaire is being issued for the purpose of identifying Safety and Health risks associated with Asbestos and RCF exposures at GSENA facilities. Both Asbestos and RCF are hazardous fibers that, when breathed into the lungs, can cause serious long-term health effects such as cancer and mesothelioma. Some milder health effects include skin and eye irritations.

Data obtained from this questionnaire will be used to develop and administer a comprehensive program that will address the Asbestos and RCF risks found at GSENA facilities.
All GSENA facilities are expected to complete this questionnaire using information obtained from OEM data, historical data, informal statements, etc…

For all responses that require an explanation, please be specific.

- If your company has multiple locations, please complete one questionnaire for each.
- Attach any relevant information to the questionnaire (pictures, work orders, drawings, etc…)

Date: _____

Name of Company: _____

Site Location: _____

Responsible Person: _____

E-Mail Address: _____

Telephone Number:

This Location is: Owned by GDF SUEZ ☐ Rented or Leased by GDF SUEZ ☐

If rented or leased, has the owner performed an Asbestos or RCF Inventory?	Yes	No	Unsure
	☐	☐	☐

1.	Has this location conducted a preliminary Asbestos inventory?	Yes ☐	No ☐
2.	Has this location conducted a preliminary RCF inventory?	Yes ☐	No ☐
3.	Has this location conducted a definitive Asbestos inventory by accredited experts?	Yes ☐	No ☐
4.	Has this location conducted a definitive RCF inventory by accredited experts?	Yes ☐	No ☐
5.	Has Asbestos or RCF been identified?	Yes ☐	No ☐
	Please explain:		
6.	Have the inventories been updated within the last 5 years?		
a.	Asbestos Inventory?	Yes ☐	No ☐
b.	RCF Inventory?	Yes ☐	No ☐
7.	If Asbestos or RCF has been identified at the facility, do GSENA, temporary or contract employees perform work on or near this material where a potential risk exposure is created?	Yes ☐	No ☐
8.	If GSENA, temporary or contract employees perform work on or near Asbestos or RCF where a potential risk exposure is created, is Industrial Hygiene monitoring conducted to ensure that the employees are below the workplace exposure limits?	Yes ☐	No ☐
9.	Do you have any of the following facilities that may contain Asbestos or RCF containing material?		
a.	Fixed real estate (buildings with thermal insulation, noise insulation, fireproofing material)	Yes ☐	No ☐
b.	Fixed process assets (machinery, boilers, pipes, thermal insulation, noise insulation)	Yes ☐	No ☐
c.	Fixed linear assets (distribution grids)	Yes ☐	No ☐
d.	Vehicles (insulation, brake pads, clutch disks)	Yes ☐	No ☐
e.	Spare parts	Yes ☐	No ☐
f.	Controlled or uncontrolled waste	Yes ☐	No ☐
g.	Other: (please explain)		
10.	If RCF is present, has it been exposed to temperatures over 900°C (1625°F)?	Yes ☐	No ☐

11.	If RCF has been exposed to temperatures above 900°C, please provide information about its location, estimated temperature and time of exposure. (be specific):			
12.	Has this facility been subject to one of the following scenarios which have the potential for causing a release of Asbestos and RCF into the environment?			
a.	Natural erosion (wind, rain, etc…)	Yes ☐	No ☐	
b.	Process erosion (mechanical, flow, waves, etc…)	Yes ☐	No ☐	
c.	Thermal degradation	Yes ☐	No ☐	
d.	Ageing of binding material	Yes ☐	No ☐	
e.	Explosion	Yes ☐	No ☐	
f.	Vibration	Yes ☐	No ☐	
g.	External impact (vehicle, machinery, etc…)	Yes ☐	No ☐	
h.	Earthquake			
13.	Has the asbestos or RCF identified in buildings, installations, networks, processes, etc… been encapsulated?	Yes ☐	No ☐	
a.	Is the encapsulation partial or general?	Partial ☐	General ☐	
b.	If there is no or partial encapsulation, what budget would be necessary to fully encapsulate the material?	Estimated Amount: $		
14.	Does your facility have friable Asbestos containing materials?	Yes ☐	No ☐	
15.	Does your facility have friable RCF containing materials?	Yes ☐	No ☐	
16.	Does this facility have an Asbestos or RCF waste storage and disposal policy or program?	Yes ☐	No ☐	
17.	Are you in full compliance with all Federal, Regional & State regulations pertaining to Asbestos & RCF, including: 1. Medical Surveillance 2. Employee Training 3. Industrial Hygiene 4. Personnel Protection	Yes ☐	No ☐	Not Sure ☐
a.	If No, Which areas need improvement? (please explain):			
18.	Do you have an action plan in place for managing Asbestos or RCF?	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐	

19.	Does your facility have a written policy regarding:	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐
20.	Does your facility have safety procedures that deal specifically with working with or handling:	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐
21.	Are your employees trained in these written procedures?	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐
22.	Do these procedures apply to contract personnel?	Yes ☐	No ☐
a.	If No, how are contractors informed of Asbestos or RCF hazards at your facility? (please explain):		
23.	Does your company have a formal medical surveillance program for Asbestos or RCF?	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐
24.	If employees are exposed to Asbestos or RCF, does this facility have a plan in place to provide medical follow-up care at an Occupation Health Clinic?	Yes ☐	No ☐
25.	Does your facility maintain records of employee exposures to Asbestos or RCF	Asbestos Yes ☐ No ☐	RCF Yes ☐ No ☐
26.	How many confirmed cases of work related lung disease do you have among your current employees?	(Provide Number)	
27.	Has this facility had any confirmed cases of work related lung disease within the past: 5 years ☐ 10 years ☐ 15 years ☐ 20 years ☐ 25 years ☐ 30 years ☐		
28.	Have any of these cases resulted in a claim against the company?	Yes ☐	No ☐

a.	If Yes, please provide details (Name of Person, Company, Type of Complaint or Claim) about each claim: Claim #1 – Claim #2 – Claim #3 –		
29.	Do any of these claims involve retired personnel?	Yes ☐	No ☐
30.	Does this facility have insurance to cover the legal and financial consequences of claims?	Yes ☐	No ☐
a.	If Yes, this insurance coverage applies to:	SUEZ Personnel ☐ Contractors ☐	
31.	If not covered, what other means of financial protection do you have against the financial risks associated with legal claims? (please explain):		

Additional Information: