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Asbestos Inspection and Bulk Sampling

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides instructions to conduct limited Asbestos Hazard Emergency Response Act (AHERA) and Asbestos Inspections and collect bulk samples using Site Wide Industrial Hygiene Database (SWIHD) documentation.

1.2 Scope

This procedure pertains to conducting AHERA and Asbestos Inspections and collecting bulk samples using SWIHD documentation in all Tank Operations Contractor (TOC) buildings and tank farms.

2.0 INFORMATION

2.1 Terms and Definitions

Terms and definitions used in asbestos inspection and sampling:

- ACM - Asbestos Containing Material
- AHERA - Asbestos Hazard Emergency Response Act
- AWP - Asbestos Work Permit
- CAB - Cement Asbestos Board
- FLT - Floor Tile
- NEA - Negative Exposure Assessment
- PACM - Presumed Asbestos Containing Material (Thermal System Insulation (TSI) and Surfacing)
- RFM - Roofing Material
- SM - Suspect Material (Miscellaneous Material)
- SRF - Surfacing Material
- SWIHD - Site Wide Industrial Hygiene Database
- TOC - Tank Operations Contractor
- TSI - Thermal System Insulation.

2.2 General Information

This procedure applies to all TOC facilities and work locations.
3.0 PRECAUTIONS AND LIMITATIONS

3.1 Personnel Safety

WARNING - Failure to wear respiratory protection during asbestos sampling can cause permanent respiratory damage.

WARNING - Failure to use wet methods, a HEPA vacuum to prevent airborne particulate, and/or wear respiratory protection during asbestos sampling can cause permanent respiratory damage.

3.1.1 Where Presumed Asbestos Containing Material (PACM) or Suspect Material (Miscellaneous Material) (SM) are, or will be disturbed in the course of the bulk sampling, Personal Protective Equipment will be required per the Asbestos Work Permit (AWP) A-6003-870 and/or Radiological Work Permit as required.

3.1.2 Report the emergency condition to the shift office (373-2689) and/or 911, (373-0911 for cell phone). Provide all information available.

3.1.3 All identified hazards will be addressed in the pre-job safety meeting.

3.1.4 Samples will be collected using wet methods and/or HEPA-filtration at the point of disturbance to minimize airborne fiber emissions, as feasible.

3.1.5 If the asbestos sampling is in a posted FCA, CA or HCA, and a HEPA vacuum is needed, the HEPA vacuum must be an Environmental approved HEPA vacuum with associated environmental paperwork and labels for Radiation and Asbestos.

3.1.6 Asbestos Hazard Emergency Response Act (AHERA) Inspector inspection and bulk sampling training and protocols are required to perform this procedure.

3.1.7 Develop a job hazard analysis to address site-specific hazards.

3.2 Radiation and Contamination Control

Work in radiological areas will be performed using a Radiological Work Permit following review by Radiological Control per the ALARA work planning procedure TFC-ESHQ-RP_RWP-C-03.

3.3 Limits

3.3.1 No abatement or repair activities are to commence under this procedure.
4.0 PREREQUISITES

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:

- Personnel Protective Equipment per AWP
- Asbestos Inspection Equipment
- Facility floor plans for asbestos inspections and/or labeled photographs of areas to be evaluated for asbestos hazards
- Colored markers, permanent marker, pens/pencils
- Notes on AHERA Condition Assessment and Ranking
- Asbestos Sampling Equipment: Knife, cutting tools, cork-borer, tape measure, tweezers, etc.
- Spray bottle with amended water
- Wetting Agent
- Lockdown Compound
- Plastic drop cloth
- HEPA-filtered vacuum cleaner (if required) with asbestos label
- Waste bag with “Asbestos Waste Bag” label attached
- Field Survey Log, Plastic Sampling Bags, Labels, Chain of Custody (COC)
- Photographic Equipment
- Other tools, equipment and supplies as identified by Shift Manager/OE/FWS/User.
4.2 Performance Documents

The following documents may be required during the performance of this procedure.
- TFC-ESHQ-S_IH-C-52, Asbestos Exposure Control and Management
- 7-ABS-265 Encapsulation of Asbestos
- TO-100-052 Perform Waste Generation, Segregation, Accumulation and clean-up
- Asbestos Inspection Checklist (and Instructions): A-6004-035
- Asbestos Inventory and Physical Assessment: A-6006-279
- Asbestos Work Permit: A-6003-870.

4.3 Field Preparations

4.3.1 Personnel performing this procedure for asbestos items must have a current AHERA Inspector Training Certification "On-Person" during inspections.

4.3.2 Shift Manager must approve performance of this procedure prior to use.

4.3.3 Asbestos SME must approve sampling plan prior to start of sampling.
5.0  PROCEDURE

5.1  Inspection

5.1.1  ENSURE the following (per Section 4.3) has been completed prior to continuing:

- Personnel working this procedure must have a current AHERA Inspector Training Certification (✓) Yes [ ] No [ ].
- Shift Manager has given his approval for performance of this procedure (✓) Yes [ ] No [ ].
- Completed AWP
- Completed JHA
- Sampling plan approved by Asbestos SME (✓) Yes [ ] No [ ].

5.1.1.1  IF any of the above answers are “NO”, NOTIFY FWS for resolution before continuing work AND RECORD resolution on Comments Sheet 1.

5.1.2  PERFORM visual inspection of homogeneous material(s) in building or of items or systems that are scheduled to be disturbed, including above-ceiling area inspections AND

PERFORM the following:

5.1.2.1  IDENTIFY each homogeneous material.

5.1.2.2  ESTIMATE the amount present AND CLASSIFY material condition.

5.1.2.3  PROVIDE AHERA Ranking AND

IF photograph exists, PROVIDE a photograph of the material/item/system.

5.1.2.4  IDENTIFY materials that do not require sampling and the basis for not sampling, such as an MSDS for the material, or identified exemption under AHERA (wood, metal, glass, fiberglass, rubber).
5.1 Inspection (Cont.)

5.1.3 RECORD the findings listed on Asbestos Inventory and Physical Assessment, A-6006-279 (Comments Sheet 1 may be used when additional space is required).

5.1.4 PRIOR to conducting sampling, SUBMIT completed Asbestos Inventory and Physical Assessment form, with accompanying maps and photos, to the FWS and Project Industrial Hygienist for review and approval.
5.2 Bulk Sampling

WARNING

Failure to use wet methods, a HEPA vacuum to prevent airborne particulate, and/or wear respiratory protection during asbestos sampling can cause permanent respiratory damage.

WARNING

Failure to wear respiratory protection during asbestos sampling can cause permanent respiratory damage.

5.2.1 DON PPE as instructed per the Asbestos Work Permit (AWP) A-6003-870) and/or Radiological Work Permit.

5.2.2 CONDUCT bulk material sampling and document in SWIHD.

5.2.2.1 FOLLOW AHERA protocol identified in AHERA Model Accreditation Plan training to identify the required number of samples needed AND

USE a random number generator per AHERA protocol when sampling Class I materials.

5.2.2.2 IF HEPA vacuum is used in a posted radiological contamination area, CONTACT Environmental to confirm make/model is on the approved list for use under Radiological Air Emission License FF-01.

5.2.2.3 UTILIZE wet methods when sampling AND

USE a portable HEPA-vacuum at point of disturbance when collecting samples of materials that are friable (surfacing or TSI) or will become friable during sampling (acoustic tile, wallboard).

5.2.2.4 USE drop cloths to collect debris AND

WET-WIPE the area after sampling to remove particulates.

5.2.2.5 DISPOSE of wet-wipes as sampling waste.

5.2.2.6 COLLECT layered samples to represent a complete material system (wallboard, mud, texture, etc.).
5.2 Bulk Sampling (Cont.)

5.2.2.7 IF required to prevent spread of asbestos particulates, APPLY wetting agent or lockdown.

5.2.2.8 IDENTIFY materials not sampled as either PACM, OR

DECLARE a material asbestos-free with manufacturer or product information.

5.2.3 CLEAN tools with wet-wipes between samples to minimize cross-contamination.

5.2.4 CHANGE gloves between samples to minimize cross contamination.

5.2.5 TREAT all used PPE as asbestos waste.
5.3 Cleanup

5.3.1 CLEAN work area.

5.3.2 REMOVE disposable protective clothing AND PLACE into an asbestos labeled disposal bag.

5.3.3 PLACE bags in asbestos storage receptacle for burial.

5.3.4 WIPE exterior of respirator using a clean damp rag.

5.3.5 REMOVE AND WIPE respirator clean with wet-wipe to remove all visible surface debris.

5.3.5.1 IF the AWP identifies a Negative Exposure Assessment (NEA) for the work, RETURN respirator to issuing station for cleaning AND RELEASE tools for use.

5.3.5.2 IF the AWP does not identify a NEA for the work, BAG AND HOLD respirator and tools in a bag labeled DANGER Asbestos,

5.3.5.3 IF the results of personal air sampling demonstrate exposures below the PELs, RELEASE respirator for return to issuing station and tools for use.
5.4 **Review**

5.4.1 **INFORM** FWS test is complete.

5.4.2 **FWS REVIEW AND ENSURE** the following:

- Asbestos Inventory and Physical Assessment form, A-6006-279 and/or notes and diagrams are completed as required; with a copy forwarded to the designated Industrial Hygienist
- Work requests needed as a result of this procedure are identified and generated
- Work request number(s) of any work documents generated as a result of this procedure, are recorded on Comments Sheet 1.

5.5 **Records**

This procedure is performed within a work package, as such, the procedure in its entirety will be maintained as a record per the Work Control process.

The record custodian identified in the Company Level Record Inventory and Disposition Schedule (RIDS), is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.
## Comments Sheet 1

Record any comments or instructions encountered during performance of this procedure.

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The blank area below is for hand drawn location/Item drawings.

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This Sheet may be copied as many times as needed.