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## 1.0 Purpose

To prevent occupational exposure to asbestos during construction and/or maintenance activities in accordance with applicable Environmental Protection Agency, Occupational Safety and Health Administration, and Texas Department of State Health Services (Texas DSHS) regulations.

## 2.0 Scope

This practice applies to activities involving removal and/or disturbance of asbestos containing material (ACM) and presumed asbestos containing material (PACM). ACM may include, but is not limited to; thermal system insulation, transite (cement asbestos), floor tile and sheeting, mastics (under floor tile and on thermal insulation), pipe wraps, gaskets, valve packing, moeller tubes, and roofing material.

Note that the Sixth and Ninth Amendments to Consent Decree are not applicable to Bay Plant units and facilities.

## 3.0 Procedure

### 3.1 Roles and Responsibilities

#### 3.1.1 Asbestos Compliance Manager

- 3.1.1.1 Shall act as the single point of accountability (SPA) for managing and overseeing the site compliance with applicable Environmental Protection Agency, Occupational Safety and Health Administration, and Texas Department of State Health Services regulations.
- 3.1.1.2 Shall be familiar with applicable EPA, OSHA, Texas Department of State Health Services, and the EPA consent decree on notifications, scheduling, removal, handling, transporting, disposal, training, and recordkeeping requirements for asbestos abatement activities, as well as general practices and procedure for detecting asbestos, sampling for asbestos, controlling release of asbestos, worker protection and equipment handling and decontamination procedures.
- 3.1.1.3 Shall be familiar with the requirements of the consent decree.
- 3.1.1.4 Shall successfully complete and maintain current certification in U.S. EPA/Texas DSHS approved training courses and periodic refresher courses required by 40 CFR part 763, Subpart E, Appendix C - Asbestos MAP in categories of Contractor/Supervisor and Inspector.
- 3.1.1.5 Shall be familiar with any renovations or demolition projects undertaken at the Galveston Bay facility that could or do affect ACM.
- 3.1.1.6 Shall verify that all employees or contractors working on demolition or renovation activities are in current compliance with EPA, and Texas DSHS certification and training requirements. When renovation and/or demolition are conducted in facilities that are classified as public buildings, in addition to the training and certification requirements, the personnel must have a current license issued by Texas DSHS. Personnel must carry their asbestos training card and/or license card with them at the job site.
- 3.1.1.7 Shall ensure that EPA and Texas DSHS receive asbestos-related notifications and reports required under all applicable laws and regulations and the consent decree in a timely manner.
- 3.1.1.8 Shall manage and coordinate all of the Galveston Bay Facility's internal activities relating to asbestos emissions control and compliance with

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applicable regulations.

- 3.1.1.9 Shall ensure that asbestos-related inspections are conducted in accordance with the provisions of the consent decree and the asbestos NESHAP before any demolition or removal work is performed.
- 3.1.1.10 Shall oversee maintenance of all records dealing with asbestos removal and disposal at the Galveston Bay Facility required by the EPA, Texas DSHS and OSHA, including all records required in the consent decree. The Asbestos Compliance Manager shall ensure that all information maintained in the Asbestos Compliance Information Management System (ACIMS) is up to date.
- 3.1.1.11 Ensure that any samples collected to determine the presence of asbestos containing material are collected in accordance with the following EPA guidance documents:
  - 3.1.1.11.1 Guidance for Controlling Asbestos-Containing Materials in Buildings (EPA 560/5-85-024 (June 1985))
  - 3.1.1.11.2 Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials (EPA 560/5-85-030a (Oct. 1985)).
  - 3.1.1.11.3 Guidelines for Asbestos NESHAP Demolition and Renovation Inspection Procedures (Revised) (EPA 340/1/90-007 (Nov. 1990)).

**Note:** If the above documents are updated, the updated version must be used.
- 3.1.1.12 Shall be given full authority to carry out his/her responsibilities, including authority to stop work.
- 3.1.1.13 Shall be generally available at the facility at all times during normal business hours (excluding holidays and normal vacation) and additionally as needed. If the Asbestos Compliance Manager shall not be able to perform his/her duties for an extended period or time, MPC shall provide an alternate Asbestos Compliance Manager as soon as possible that is capable of performing all duties, responsibilities, and authorities (i.e. Site Asbestos Coordinator, Asbestos trained Industrial Hygienist, or a Designated Unit Maintenance Supervisor). This will be done by delegation of authority (DOA) process for short term absence, and Management of Change (MOC) for long term changes.
- 3.1.1.14 Periodically review asbestos abatement contractor qualifications and performance.
- 3.1.1.15 Submit Texas DSHS forms for specific jobs and annual notification within regulatory time requirement as specified in this practice
- 3.1.1.16 Provide a copy of completed Texas DSHS forms to HESS.
- 3.1.1.17 Ensure that periodic inspections according to the Asbestos Containing Material Survey Schedule (Attachment B) are conducted and documented.
- 3.1.1.18 Participate in ACM-free inspection at the end of activities that involve asbestos.
- 3.1.2 Site Asbestos Coordinator
  - 3.1.2.1 Coordinate asbestos abatement activities, including renovation or demolition

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projects at the Galveston Bay site.

- 3.1.2.2 Ensure a log book for all work relating to asbestos jobs is maintained by each asbestos contractor.
  - 3.1.2.3 Receive and maintain current certification in the U.S. EPA/Texas DSHS approved training courses and periodic refresher courses for asbestos competent person level training for Supervisors and Inspectors as defined by EPA's Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C).
  - 3.1.2.4 Initiate Texas DSHS forms for specific jobs and annual notification within regulatory time requirement as specified in this practice.
  - 3.1.2.5 Where asbestos exists in the field, post and maintain signs in accordance with section [3.9.1.5](#)
  - 3.1.2.6 Ensure an adequate supply of approved asbestos disposal bags is available.
  - 3.1.2.7 Participate in ACM-free inspection at the end of activities that involve asbestos.
- 3.1.3 Designated Unit Maintenance Supervisors
- The following is the responsibility of Designated Unit Maintenance Supervisors.
- 3.1.3.1 Shall successfully complete and maintain current certification in the U.S. EPA/Texas DSHS approved training courses and periodic refresher courses for asbestos competent person level training for Supervisors and Inspectors as defined by EPA's Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C).
  - 3.1.3.2 Designated Area Maintenance Supervisors must be identified and trained [per the EPA's Model Accreditation Plan per 40 CFR Part 763 Subpart E Appendix G.](#)
  - 3.1.3.3 Shall be knowledgeable in the facilities and equipment of the unit for which they are responsible.
  - 3.1.3.4 Shall visually inspect the unit's equipment and facilities on a regular basis to determine if conditions warranting asbestos abatement activities, including any removal or demolition work, to manage or remove ACM are present. Refer to [the Asbestos Visual Assessment Form \(TCR-AVA-1\)](#)
  - 3.1.3.5 Shall maintain oversight of any asbestos abatement work, including any removal or demolition work being performed at the unit for which they are responsible to ensure that it is conducted in accordance with the provisions of the Asbestos NESHAP and the consent decree. Refer to [MP-STAT-0602 Asbestos Oversight \(MP-R-001206-GB.doc\)](#).
  - 3.1.3.6 Immediately take all necessary actions to correct any violations of the Asbestos NESHAP he/she discovers. If an immediate remedy is not possible, the Unit Maintenance Supervisor shall stop all asbestos abatement activities, including any removal or demolition work, until such violations are reported to the Asbestos Compliance Manager and corrected.
  - 3.1.3.7 The Unit Maintenance Supervisor shall be given full authority to carry out his/her responsibilities, including authority to stop work and requests for Designated MPC Supervisor Support for Delegation of Authority.
  - 3.1.3.8 Make sure that the person responsible for updating the Unit Process Safety Overview updates the information regarding areas and equipment within the

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unit that contains asbestos. The Unit Process Safety Overview will be used to inform employees and contractors of asbestos locations within the unit.

3.1.3.9 Participate in ACM-free inspection at the end of activities that involve asbestos.

3.1.4 Designated MPC Supervisor Support to Designated Unit Maintenance Supervisors

The following is the responsibility of Designated MPC Supervisor Support to the Designated Unit Maintenance Supervisors. These personnel are from Maintenance Programs, Turnaround, and Projects that perform work at Galveston Bay Refinery.

3.1.4.1 Shall successfully complete and maintain current certification in the US EPA/Texas DSHS approved training courses and periodic refresher courses for asbestos competent person level training for "Supervisors" and "Inspectors" as defined by EPA's Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C).

3.1.4.2 Shall support the Designated Area Maintenance Supervisor at the direction of the Asbestos Compliance Manager.

3.1.4.3 Shall visually inspect the unit's equipment and facilities at assigned work areas to determine if conditions warranting asbestos abatement activities, including any removal or demolition work, to manage or remove ACM present. Refer to the Asbestos Visual Assessment Form (TCR-AVA-1). This form is currently used and entered for each homogenous area identified.

3.1.4.4 Shall maintain oversight of any asbestos abatement work, including any removal or demolition work being performed at the assigned work area for which they are responsible to ensure that it is conducted in accordance with the provisions of the Asbestos NESHAP and the consent decree. Refer to [MP-STAT-0602 Asbestos Oversight \(MP-R-001206-GB.doc\)](#). The area is scored & entered into ACIMS and in-house software systems. The system can send an information notification to the appropriate employees.

3.1.4.5 Immediately take all necessary actions to correct any violations of the asbestos NESHAP he/she discovers. If an immediate remedy is not possible, the Designated MPC Supervisor Support shall stop all asbestos abatement activities, including any removal or demolition work, until such violations are reported to the Asbestos Compliance Manager and corrected.

3.1.4.6 Participate in ACM-free inspection at the end of activities that involve asbestos.

3.1.5 MPC Supervisors and Engineers

3.1.5.1 Before performing work that may disturb potential asbestos containing materials (e.g. insulation, floor tile, transite siding, etc.), MPC personnel must determine the material content. Where questions arise, the Site Asbestos Coordinator should be contacted at ext. 1149 or (409) 502-0801 to assist in that determination.

3.1.5.1.1 Vehicle brake and clutch assemblies are excluded from this requirement.

3.1.5.2 In the event asbestos is found, MPC personnel must

3.1.5.2.1 Contact the Site Asbestos Coordinator to fulfill Texas Department of State Health Services (Texas DSHS) notification requirements.

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### 3.1.6 Procurement

3.1.6.1 MPC Procurement shall include a term in all contracts for any third-party contractors retained to perform asbestos abatement activities, including any asbestos demolition or removal work at the Galveston Bay Facility substantially similar to the following:

3.1.6.2 Note: The contractor's failure to adhere to the applicable Asbestos NESHAP requirements shall be deemed a material breach of this contract.

3.1.6.3 MPC Procurement will require vendors via contract or requisition to provide SDS showing that materials or replacement parts listed in section B for [SM-3A](#) contain less than 1.0% asbestos.

### 3.1.7 Facility Services

Post and maintain signs at entrances to buildings or rooms that contain asbestos. When doing so, those responsible for posting of signs shall consider the asbestos' location in their placement (e.g. posting on doors leading to an applicable mechanical equipment room vs. placement on the doors leading to a control room facility in which the applicable mechanical room resides.)

### 3.1.8 Health, Safety, and Environment Department

3.1.8.1 Coordinate and administer the Galveston Bay Site Asbestos Management Practice.

3.1.8.2 Provide guidance in the implementation of the practice.

3.1.8.3 Maintain Texas DSHS notifications for a period of 30 years from the date of completion.

### 3.1.9 Training Department

Maintain training records as specified in this practice.

### 3.1.10 Asbestos Abatement Contractors

3.1.10.1 Maintain a written program that meets or exceeds the requirements of this practice and applicable standards.

3.1.10.2 Ensure employee compliance with their written program.

3.1.10.3 Ensure its employees receive and maintain asbestos training for the class of work they will be performing and applicable OSHA and EPA regulation.

3.1.10.4 Ensure its employees receive annual overview of SM-3 Asbestos Management practice.

3.1.10.5 Ensure exposure monitoring is conducted and monitoring records are maintained.

3.1.10.6 Ensure medical surveillance is conducted.

3.1.10.7 When requested, provide negative exposure assessment documentation.

3.1.10.8 When requested, provide air monitoring and bulk sample analytical results.

3.1.10.9 Maintain and provide HEPA equipment (including vacuums) to their personnel.

## 3.2 General Requirements

3.2.1 Before performing work that may disturb potential asbestos containing materials (e.g. insulation, floor tile, transite siding, etc.), MPC personnel must determine the material

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content. Where questions arise, the Site Asbestos Coordinator should be contacted to assist in that determination.

Note: Vehicle brake and clutch assemblies are excluded from this requirement.

- 3.2.2 In the absence of a determination, MPC will assume the material is asbestos. To minimize delays in job execution, this determination is best performed during the planning process
  - 3.2.3 MPC employees and contractors are required to report any violations of the Asbestos NESHAP during asbestos demolition and/or removal work to the Asbestos Compliance Manager or the Designated Unit Maintenance Supervisor, and report the non-compliance through the incident reporting process.
  - 3.2.4 Prior to disturbing potential asbestos containing material, [Potential Asbestos Containing Material Removal Permit \(Form SM-3A\)](#) must be completed and PR-3 Safe Work Permit Procedure must be followed. Refer to 3.9
  - 3.2.5 Asbestos sampling (bulk) must be performed by a current certified Inspector as defined by EPA's Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C). In an emergency, sampling may be performed by a Certified Industrial Hygienist (CIH).
  - 3.2.6 Excluding removal of vehicle brake and clutch assemblies, MPC personnel are prohibited from conducting asbestos repair, maintenance, or abatement jobs. Before performing the work noted above, MPC employees must be trained in the safe removal of these specific asbestos products.
  - 3.2.7 Installation of new asbestos containing materials is prohibited. ACM insulation shall be replaced with non-ACM insulation as asbestos abatement, removal, and/or demolition work is conducted throughout the Galveston Bay Facility
  - 3.2.8 Labeling for New Insulation
    - 3.2.8.1 To provide for easy identification, silver banding imprinted with "No Asbestos" wording or blue banding are used to secure new insulation. Insulation installed must also incorporate use of a non-asbestos identifier (Attachment D.) This is not required on previously identified "Refinery Asbestos Insulation Free Units" (Attachment C).
- 3.3 Abatement Management
- 3.3.1 Day-to-Day Jobs
    - 3.3.1.1 The Site Asbestos Coordinator will coordinate asbestos abatement activities.
    - 3.3.1.2 The Site Asbestos Coordinator will ensure a log book for all work relating to asbestos jobs is maintained by each contractor.
      - 3.3.1.2.1 The log book will document all asbestos jobs and related information (i.e. contractor doing the asbestos work, specific unit, location, bulk sampling results, exposure monitoring results, problems with the job, replacement material, etc.)
  - 3.3.2 Periodic Inspections
    - 3.3.2.1 To monitor the condition of asbestos insulation, the Asbestos Compliance Manager will ensure that periodic inspections according to the Asbestos Containing Material Survey Schedule (Attachment B) are conducted and documented. Periodic inspections will not include those units found in Attachment C, entitled "Asbestos Insulation Free Units," as these areas have been previously evaluated and found to be free of asbestos.



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3.3.2.2 The Asbestos Compliance Manager will periodically review asbestos abatement contractor qualifications and performance.

3.3.3 Asbestos Abatement Contractor Qualifications

Only qualified asbestos abatement contractors approved by HESS will perform asbestos abatement onsite. The Industrial Hygiene Department will review and approve contractor qualifications using the criteria listed in Attachment A.

3.4 Communication of Hazard

To communicate the hazards associated with asbestos and also to help identify the location of asbestos at the Galveston Bay site, the following methods will be used;

3.4.1 Equipment Specific Asbestos Identification

3.4.1.1 Where feasible, previously installed asbestos products will be affixed with a visible label that is black, red, and white in color and contains the following information:

DANGER  
CONTAINS ASBESTOS FIBERS  
AVOID CREATING DUST  
CANCER AND LUNG DISEASE HAZARD

3.4.1.1.1 The equipment and piping may also be red banded identifying it as asbestos containing material.

3.4.1.2 Previously installed insulation may have been secured with “No Asbestos” imprinted silver banding (indicating that the insulation within is asbestos-free.) or blue banding, and/or equipment may be marked as “Asbestos Free”.

3.4.1.3 Previously installed insulation may incorporate non-asbestos insulation identifiers (Attachment D).

3.4.2 Signs

3.4.2.1 In Buildings - MPC will inform all building occupants of the presence of ACM and PACM inside buildings via the posting of signs. This includes postings at all entrances to mechanical equipment rooms and control rooms that contain ACM or PACM. The posting and maintenance of signs and their location is the responsibility of Building Services with guidance from HESS. Signs will be yellow in color with black lettering and shall read;

**DANGER**

**SOME BUILDING MATERIALS IN THIS BUILDING  
COULD CONTAIN ASBESTOS FIBERS**

**AVOID CREATING DUST  
IN AREAS CONTAINING ASBESTOS  
CANCER AND LUNG DISEASE HAZARD**

**BEFORE PERFORMING WORK THAT MAY POTENTIALLY  
DISTURB THIS MATERIALS, REFER TO THE SM-3  
ASBESTOS MANAGEMENT POLICY OR CONTACT  
THE ASBESTOS COORDINATOR FOR APPROPRIATE  
WORK PRACTICES AND INFORMATION**



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- 3.4.2.2 Outdoors - where section 3.4.1.1.1 has not been wholly applied to an applicable process unit, MPC will inform employees and contractors of the presence of ACM and PACM in the field via posting of signs at entrances to associated control rooms. The posting and maintenance of signs and their location is the responsibility of the Site Asbestos Coordinator with guidance from HESS. Signs will be yellow in color with black lettering and will read;

<p><b>DANGER</b></p> <p><b>ACM/PACM INSIDE THIS AREA INCLUDE:</b></p> <p>___ Pipe Insulation      ___ Duct Insulation</p> <p>___ Tank Insulation      ___ Fireproofing</p> <p>___ Other _____</p> <p><b>THESE MATERIALS CONTAIN ASBESTOS FIBERS</b></p> <p><b>AVOID CREATING DUST</b></p> <p><b>CANCER AND LUNG DISEASE HAZARD</b></p> <p><b>BEFORE PERFORMING WORK THAT MAY DISTURB THIS</b></p> <p><b>MATERIAL, CONTACT THE ASBESTOS COORDINATOR FOR</b></p> <p><b>APPROPRIATE WORK PRACTICES AND INFORMATION</b></p>
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- 3.4.3 Applicable Process Safety Overviews will communicate the existence of asbestos using the wording below or similar.

“Asbestos Containing Material/Presumed Asbestos Containing Material exists on this unit and may be found in the following; pipe insulation, duct insulation, tank insulation, fireproofing, and cooling tower transite panels. Before performing any work that may disturb unknown insulating material, the Site Asbestos Coordinator must be contacted for appropriate work practices and information.”

- 3.4.4 Training - MPC Employee

Operations and Maintenance employees must receive annual asbestos awareness level training. All other MPC personnel will receive asbestos awareness level training every two years.

- 3.4.4.1 The Asbestos Compliance Manager, Site Asbestos Coordinator, Designated Unit Maintenance Supervisors and Designated MPC Supervisor Support to Designated Unit Maintenance Supervisors must receive and maintain EPA/Texas DSHS approved training courses and periodic refresher courses for asbestos competent person level training for Supervisors and Inspectors as defined by EPA’s Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C). These personnel must also receive overview of SM-3 Asbestos Management practice on annual basis.

3.5 Bulk Sampling

- 3.5.1 When bulk sampling is required to determine asbestos content of materials, sample collection must be performed by an individual having successfully completed an inspector’s course as defined by EPA’s Model Accreditation Plan (40 CFR part 763, Subpart E, Appendix C - Asbestos MAP).
- 3.5.2 However, in an emergency, sampling may be performed by a Certified Industrial Hygienist.
- 3.5.3 Samples collected to determine asbestos content must be analyzed by a laboratory possessing National Voluntary Laboratory Accreditation Program (NVLAP) certification.
- 3.5.4 For recordkeeping purposes, the Asbestos Compliance Manager will ensure a bulk

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sample log is maintained in the ACIMS database, which includes Verdant and in-house software system sample spreadsheets.

### 3.6 Texas Department of State Health Services Notifications

3.6.1 If quantities greater than 260 linear feet, 160 square feet, or 35 cubic feet of asbestos will be removed during a specific job, the Texas DSHS must be notified.

The Site Asbestos Coordinator must be contacted prior to the completion of the Texas DSHS notification form.

3.6.1.1 The form must be sent to the Texas DSHS at least 10 working days prior to the commencement of work.

3.6.1.2 An amendment must be submitted for any changes from the original notification and must be provided to the Texas DSHS no less than 24 hours prior to change, including stop date changes.

3.6.1.3 If an emergency arises and the 10 working days advance notice is not possible, the Site Asbestos Coordinator must be contacted immediately so that special arrangements can be made.

3.6.1.4 Before the demolition of a building or facility or load-supporting structural member, even when no asbestos is present.

### 3.6.2 Annual Notification

Annual notification must be made for scheduled renovations (routine maintenance) performed during each calendar year.

3.6.2.1 The Texas DSHS requires the annual notification form at least 10 working days before the beginning of the calendar year for which notice is being given.

3.6.2.2 The Asbestos Compliance Manager is responsible for compiling this information and sending in the required form.

### 3.7 Environmental Protection Agency Notifications

#### 3.7.1 Asbestos NESHAP Non-Compliance Notification

If MPC personnel become aware of or receives any information indicating that any asbestos demolition and/or removal work being performed at the Galveston Bay Facility does not comply with the Asbestos NESHAP, they must report the non-compliance through the incident reporting process.

3.7.1.1 The Environmental Department shall submit written notification of such non-compliance to EPA within 48 hours and notify the Asbestos Compliance Manager.

3.7.1.2 This notification shall describe the nature of the work being performed, the location where such work is occurring within the facility, the amount of ACM involved in the work being performed, the nature of the non-compliance, the duration of such non-compliance, and any remedial action taken.

#### 3.7.2 Annual Asbestos Report

The Environmental Department will submit an annual asbestos report to the EPA. Data is extracted from the ACIMS Database for the calendar year of all asbestos activities that took place. The data is reviewed by the Asbestos Compliance Manager / Asbestos Designated Asbestos MPC Supervisors / Asbestos Consulting Group prior to submitting to the Environmental Department. The report will contain the following information:

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A summary of all asbestos abatement, renovation, and removal work performed at the Galveston Bay Facility over the preceding calendar year.

- 3.7.2.1 A listing of each MPC employee and supervisor who has received the training required by the consent decree, a description of the training completed, the date such training was completed, the identity of the training provider, and a copy of the training certificate indicating that such training or refresher training was satisfactorily completed.
- 3.7.2.2 Certification signed by the MPC Galveston Bay Refinery Business Unit Leader.

### 3.8 Exposure Assessments

#### 3.8.1 MPC and Contractor work involving asbestos

- 3.8.1.1 For each type of asbestos job, airborne asbestos levels will be considered greater than the PEL until a negative exposure assessment has been conducted.
- 3.8.1.2 When requested, contractors will provide MPC a copy of negative exposure assessments.

#### 3.8.2 Clearance monitoring following all negative pressure enclosure/indoor asbestos work

- 3.8.2.1 Contractors will have a third party conduct clearance monitoring for all negative pressure enclosure (NPE)/indoor asbestos work prior to releasing the regulated area.
  - 3.8.2.1.1 Prior to performing clearance monitoring the area must be visually free of asbestos (see definition in section 4.0).
  - 3.8.2.1.2 Samples must be analyzed by a laboratory that actively participates in the American Industrial Hygiene Association's Proficiency Analytical Testing (PAT) program
- 3.8.2.2 A NPE/indoor area will not be considered safe for entry until monitoring results show a level < 0.01 fibers/cc.

#### 3.8.3 Personal Exposure Monitoring Following a Major Incident

Following a major incident (e.g. major fire, explosion, equipment rupture, and hurricane), personal exposure monitoring will be conducted to make sure that employee exposures are below the permissible exposure limit. Industrial Hygiene must be notified following such an event to coordinate the required monitoring.

### 3.9 Safe Work Practices

#### 3.9.1 MPC Employees

- 3.9.1.1 MPC personnel that have been properly trained may remove vehicle brake and clutch assemblies (see section XII. A. 3.)
- 3.9.1.2 MPC personnel are prohibited from conducting any asbestos repair, maintenance, or abatement jobs for which they have not been trained. In situations other than those listed above, MPC employees should secure a site approved asbestos abatement contractor.
- 3.9.1.3 When performing removal of gaskets, equipment packing, vehicle brake and clutch assemblies, MPC personnel will perform such work using the following safe work practices;

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3.9.1.3.1 Identifying gasket or packing material

3.9.1.3.1.1 Gaskets or packing material in or on equipment may contain asbestos and needs to be verified prior to removal.

3.9.1.3.1.2 If there is no historical data or product information identifying the gasket or packing material, personnel must assume the material is asbestos.

3.9.1.3.2 Process for Unbolting Equipment

3.9.1.3.2.1 When dismantling equipment, determine if there is any product information or historical data.

3.9.1.3.2.2 During the dismantling process (unbolting), spray the gasket or packing material with amended (soapy) water or lubricating oil to prevent fibers from becoming airborne.

3.9.1.3.2.3 If the gasket or packing material is not asbestos, work can continue.

3.9.1.3.2.4 After the unbolting phase, if the gasket or packing contains asbestos or you are unsure, contact the Site Asbestos Coordinator, at x1149 or 409-502-0801

3.9.1.3.2.5 When in doubt, contact the Site Asbestos Coordinator or one of the site's maintenance supervisors with asbestos training. The [GBR Asbestos Trained Personnel List](#) can be found in the Maintenance N-Drive Asbestos folder for the current year.

3.9.1.4 Engineering and work practice controls will be administered by the Site Asbestos Coordinator or asbestos competent person.

3.9.1.5 Signs like the one below are used to designate a "regulated" area;

<p>DANGER  ASBESTOS  CANCER AND LUNG DISEASE HAZARD  AVOID CREATING DUST  AUTHORIZED PERSONNEL ONLY  RESPIRATORS AND PROTECTIVE CLOTHING  ARE REQUIRED IN THIS AREA</p>
---

3.9.1.6 MPC employees and contractors (excluding the Asbestos Compliance Manager, Designated Unit Maintenance Supervisors or Site Asbestos Coordinator, and asbestos contractors) must remain outside of regulated areas. During an emergency and under the direction & training of the site Asbestos Compliance Manager select individuals investigating and working in the area can be supervised to make temporary entry wearing full asbestos PPE and using decontamination stations as instructed and trained.

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3.10 Disposal

3.10.1 Asbestos containing material (including gaskets, brake pads, clutch plates and associated remnants) must be disposed of in approved disposal bags. Bags must be of 6 ml polyethylene and meet specific labeling requirements. The Site Asbestos Coordinator should be contacted to obtain approved disposal bags.

3.10.2 When drums are used in addition to disposal bags, drums must be labeled as follows;

<p>DANGER CONTAINS ASBESTOS FIBERS MAY CAUSE CANCER CAUSES DAMAGE TO LUNGS DO NOT BREATHE DUST AVOID CREATING DUST</p>
--

3.10.3 Once the disposal bag/drum is full, the Environmental Department shall be contacted for appropriate disposal per ENV-30 Asbestos Waste Disposal practice.

When drums are inappropriate (e.g. larger quantities), the Environmental Department shall be contacted for disposal guidance.

3.11 Emergency or Accidental Exposure

In the event of accidental exposure (e.g. striking insulation with equipment and insulation falls on you), treat the insulation as you would any hazardous chemical and use the emergency shower. Once the clothing is wet, it can be removed and replacement clothing can be donned. Wet clothing should be put into an appropriately labeled asbestos bag. The Site Asbestos Coordinator can be contacted for approved bags and to coordinate appropriate disposal.

3.12 Medical Surveillance

Due to the limited nature of asbestos work allowed by MPC employees, medical evaluations will not be conducted. However, should a MPC employee be exposed above the PEL for a combined total of 30 days or more in a given year, medical surveillance will be provided.

3.13 Asbestos Compliance Information Management System (ACIMS)

3.13.1 The ACIMS database will be used to maintain the following information:

3.13.1.1 All information regarding asbestos abatement, removal, and/or demolition activities including, but not limited to:

3.13.1.1.1 dates such abatement, removal, and/or demolition work are scheduled for

3.13.1.1.2 dates such abatement, removal, and/or demolition are actually performed

Note: **In house software systems** will be used to track all costs including cost of non-asbestos work activities such as site preparation, building scaffolding and enclosures. The intent is that dates for asbestos work **will be generated electronically using our in-house software systems and** will match dates provided in the agency notifications.

3.13.1.1.3 nature of the abatement, removal, and/or demolition work performed

3.13.1.1.4 the specific location within the facility at which the abatement,

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removal, and/or demolition work shall be performed.

- 3.13.1.1.5 the quantity of ACM involved in the abatement, removal, and/or demolition work performed.
- 3.13.1.2 All information regarding each asbestos-related inspection performed at the Galveston Bay Facility including, but not limited to:
  - 3.13.1.2.1 the dates such inspections are scheduled
  - 3.13.1.2.2 the dates such inspections are actually performed
  - 3.13.1.2.3 the specific location within the Galveston Bay Facility at which the inspection shall be performed
  - 3.13.1.2.4 the nature of the inspections performed and any findings made
- 3.13.1.3 All information regarding the disposal of ACM from the Galveston Bay Facility, but not limited to:
  - 3.13.1.3.1 the identity and location of any facility to which ACM from the Galveston Bay Facility shall be sent for disposal, handling and/or treatment.
  - 3.13.1.3.2 the dates such ACM is sent to any facility for disposal, handling, and/or treatment
  - 3.13.1.3.3 the quantity of ACM sent for disposal, handling, and/or treatment
  - 3.13.1.3.4 the specific source unit and/or area within the Galveston Bay Facility from which the ACM being sent for disposal, handling, and/or treatment was removed
  - 3.13.1.3.5 the manifest number and date of any manifest required for shipments of ACM
- 3.13.1.4 All information regarding required asbestos-related personnel training including, but not limited to:
  - 3.13.1.4.1 The name of each employee subject to asbestos-related training requirements.
  - 3.13.1.4.2 A description of the training requirements for each employee.
  - 3.13.1.4.3 The scheduled dates by which each employee must complete individual training requirements.
  - 3.13.1.4.4 The date such training requirement is successfully completed by each employee.
  - 3.13.1.4.5 The [GBR Asbestos Trained Personnel List](#) can be found in the [Maintenance N-Drive Asbestos folder for the current year.](#)
- 3.13.1.5 Available historical abatement, removal, and demolition records and data.
- 3.13.2 The [ACIMS system and our in-house software systems](#) have the functionality to provide alerts or other notifications in a timely manner to appropriate personnel at the Galveston Bay Facility regarding any individual duties and/or responsibilities they may have to ensure compliance with the Asbestos NESHAP and the consent decree.
  - 3.13.2.1 This functionality shall include timely alerts or other notifications regarding impending deadlines for required inspections, submissions of notifications, completion of asbestos abatement, removal, or demolition work requirements, and/or other reporting requirements.

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- 3.13.2.2 This functionality shall also include timely alerts or other notifications regarding impending deadlines to complete other individual obligations, such as periodic training requirements.
- 3.13.2.3 The **ACIMS** database (including all in-house software systems) has the functionality to provide such alerts or other notifications upon entry of “triggering” data (such as entry of scheduled dates for asbestos abatement, removal or demolition work) and based on the approach and passage of scheduled calendar dates for recurring tasks.
- 3.13.2.4 Any outstanding obligations to perform asbestos abatement, removal, or demolition work shall be listed as individual open action items in the Galveston Bay Facility’s Asbestos Compliance Information Management System until completed.

3.14 Recordkeeping

- 3.14.1 HESS will maintain agency notifications for a period of 30 years from the date of completion.
- 3.14.2 HESS will maintain air monitoring data for sampling conducted on MPC personnel
- 3.14.3 The Asbestos Compliance Manager will ensure analytical results from bulk samples and air monitoring are maintained in the **ACIMS** database.
- 3.14.4 If all asbestos insulation is removed from a process unit, the Asbestos Compliance Manager will make sure that appropriate documentation are maintained in the **ACIMS** database demonstrating that the unit no longer contains asbestos insulation.
- 3.14.5 The Learning & Development (L&D) Department will maintain asbestos training records for MPC employees for a period of one year beyond the last date of employment. Asbestos awareness training will be recorded by L&D Department. Asbestos program specific training will be recorded in Passport and documentation will be maintained in **ACIMS** database.

3.15 Competencies and Training

- 3.15.1 See 3.1 Roles and Responsibilities
- 3.15.2 See 3.4.4 Hazard Communication Training

**4.0 Definitions**

- 4.1 **Amended Water** – Water that contains a surfactant to help the water wet the ACM/PACM.
- 4.2 **Asbestos Competent Person** – Someone that has been trained and is capable of identifying existing asbestos hazards, selecting the appropriate control strategy, and has the authority to take prompt, corrective measures to eliminate them. Training will meet the requirements in EPA’s Model Accreditation Plan (40 CFR part 763) for “Supervisors.”
- 4.3 **Asbestos Containing Material** – Any material that contains 1% asbestos or greater.
- 4.4 **Disturbance** – any activity that may generate airborne asbestos fibers, including walking on or touching friable ACM, and using hand or power tools to remove ACM.
- 4.5 **Exposure Limits** – The Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) for asbestos is 0.1 fibers/cubic centimeter (f/cc) over an 8-hour time period. The OSHA excursion limit is 1.0 f/cc over a 30 minute period.
- 4.6 **Friable** – Asbestos material that can be pulverized or crumbled into fine debris or dust with hand pressure.



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- 4.7 **Gasket, Intact** – An ACM/PACM gasket that has retained its binder integrity and is in a non-friable condition so that it would not crumble or disintegrate into a dust or fine debris with hand pressure.
- 4.8 **Gasket, Non-Intact** – An ACM/PACM gasket that has lost its binder integrity or is in a friable condition
- 4.9 **Negative Exposure Assessment** – A determination, made by HESS or the contractor through exposure monitoring conducted within the last 12 months and/or objective data, that employee exposure during a specific type of asbestos job would be below the action level.
- 4.10 **Presumed Asbestos Containing Material** – Any thermal system insulation or surfacing material found in buildings constructed prior to 1981 that has not been proven (through testing) to be asbestos free.
- 4.11 **Visually Asbestos Free** – An area and/or surface that has been remediated to the extent there is no visible dust, debris and/or residual asbestos containing material remaining visible to the human eye.

Exception: If potential asbestos containing materials remain engrained in pitted or rusted areas on metal substrates, and those materials cannot be removed at the initial asbestos remediation because it would not be safe to conduct the aggressive methods necessary to remove them, this area or surface would remain in the data registry and demarcated at location until aggressive methods of remediation can be applied by properly accredited asbestos personnel.

## 5.0 References

- 5.1 OSHA Asbestos Construction Standard (29 CFR 1926.1101)
- 5.2 OSHA General Industry Standard for Asbestos (29CFR 1910.1001)
- 5.3 EPA (40 CFR Part 763)
- 5.4 EPA NESHAPS (40 CFR Part 61)
- 5.5 Texas Department of Health Regulations (25 TAC 295).
- 5.6 Sixth Amendment to the Consent Decree, Date of Entry 9/18/2009
- 5.7 Ninth Amendment to the Consent Decree, Date of Entry 8/14/2013
- 5.8 Guidance for Controlling Asbestos-Containing Materials in Buildings (EPA 560/5-85-024 (June 1985))
- 5.9 Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials (EPA 560/5-85-030a (Oct. 1985)).
- 5.10 Guidelines for Asbestos NESHAP Demolition and Renovation Inspection Procedures (Revised) (EPA 340/1/90-007 (Nov. 1990)).
- 5.11 MPC Galveston Bay Refinery Maintenance Procedure MP-STAT-0602 Asbestos Oversight.
- 5.12 MPC Galveston Bay Refinery Maintenance Procedure MP –STAT-0603 Asbestos Visual Inspection.

## 6.0 Attachments

- 6.1 Attachment A: Contractor Qualifications
- 6.2 Attachment B: Asbestos Containing Material Survey Schedule
- 6.3 Attachment C: Refinery “Asbestos Insulation Free” Units

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6.4 Attachment D: Non-Asbestos Insulation Products with “Asbestos Free” Identifiers

**7.0 Revision History**

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue. Consolidated site procedures that replaces GBR-HESS-SM-03 and RSW-0035-TC under MOC M20182887-001.	M. K. Alberts	J. G. Montminy	3/9/2018	4/15/2018
1	Updated Attachment B survey schedule with Bay Plant units under MOC M20182887-001.	M. K. Alberts	J. G. Montminy	12/20/218	12/20/2018
2	Updated title, document, file and system references to reflect current practice.	C. T. Hart	H. F. Sheard	10/23/2024	11/12/2024

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### **Attachment A: Contractor Qualifications**

- A. Asbestos competent persons have completed 40 hr asbestos competent person level training for "Supervisors" as defined by EPA's Model Accreditation Plan (40 CFR part 763).
- B. Asbestos workers have received 4 days asbestos workers training in accordance with the EPA's Model Accreditation Plan (40 CFR part 763).
- C. Maintain asbestos program that meet OSHA, EPA and TDSHS regulations.
- D. Competent persons and workers refresher training is conducted annually.
- E. Annual medical surveillance and fit test.
- F. Written respiratory protection plan to be maintained and adhered to during periods of abatement activities.
- G. A description of the protective clothing and respirators which will be used.
- H. A description of decontamination procedures.
- I. A description of the procedures for handling waste containing asbestos.
- J. A description of the removal and encapsulation methods.
- K. A description of air monitoring procedures.
- L. A description of final clean up procedures.
- M. Recordkeeping procedures
- N. A list of abatement projects completed in the past year.

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**Attachment B: Asbestos Containing Material Survey Schedule**

East/West Plant <b>Annually</b>			
Unit	Building	Unit	Building
Alky 3	Alky2 Analyzer Building 2	OMCC	AU2/NDU/ISOM Control Room
Acid Plant	Alky 3 Analyzer Bldg.3	Power 2	Marine Facility-Dock House 54
ARU	Alky 3 Control Room	Power 3	Marine Facility-Dock Meter St.
Coker VRU	ARU Lab	PS3A	Marine Facility Old Dock House 37-38
Coker -B	AU2 Maintenance Building	PS3B	Marine Facility - Old Meter Station
DDU 100, 200	Craft Building	SRU A&B	OMCC Bull Pen
Env. Facility	Main Warehouse	ULC	Oil Movement Control Center -OMCC
FCCU1	Central Shop - Machine Shop	UU3	OMCC Load Center #8
FCCU2	Gate 38	UU4	OMCC Stationary Knock Lab
FCCU3	No.21 21st South		OSUE Switch House #3
	NOB, GOB		Power 2 P-201 Building
	Analyzer Building		Power 2 Satellite Warehouse
	Cracking Div. Control Center-		WTP1-1021 Building
	CDCC		Power 3 - Control Building #1022
	CFHU Switch House 3		Power 3 - Old Analyzer Building
	Coker Control Room		SRU Analyzer Shelter 3 & 4
	Coker Change House		SRU Control Room
	Env. Facility Control Room		SRU Sour Water Switch Gear
	Env. Facility Load Center 12		SRU Zone Store Building
	Env. Facility Load Center 25A		UU3/ARU/ULC Control Room
	Env. Facility SDU Control Room		UU4/DDU Control Room
	FCCU 2 Control Room		UU4 Main Switch Gear Room
	FCCU 3 Control Room		

Bay Plant <b>Annually</b>	
Unit	Unit
Alky	FCCU
Plant A	5-Topper 4-
Gascon	Topper
S.T.F.	Boilerhouse
C.W.T.	
Propylene	
Warehouse	
W.T.F.	
W.W.T.P.	
Docks	
Gasoil	
N.T.F.	
A.T.F.	
OMCC	
Buildings	
Udex	
Platformer	

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**Attachment C: Refinery "Asbestos Insulation Free" Units**



Note: Asbestos insulation free units are still regulated and required to notify governmental agencies of structural demolition.

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**Attachment D: Non-Asbestos Insulation Products with “Asbestos Free” Identifiers**

Manufacturer	Asbestos-Free Identifier
Johns Manville (Thermo-12)	Golden flecks of MICA within a blue or gold filler
Louisiana Pacific (Pabco Super Caltemp)	Black fibers within a yellow or gold filler, green stripe on edge
Owens Corning (Kaylo 10)	gold/black particles within a pink filler
Owens Corning (Fiberglass)	pink filler throughout
Calsilite (Calcium Silicate)	blue powder on outside
Newly Manufactured Calcium Silicate (post industry consolidation of identifier)	gold color throughout