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1. Purpose

1.1. This procedure sets forth the manner in which occupational exposures to asbestos and asbestos containing material (ACM) will be managed at Marathon Petroleum LLC's Michigan Refining Division (MRD).

1.2. This plan sets forth the procedures which have been established for identifying and controlling employee exposure to asbestos. It has been developed pursuant to the MPC Asbestos Exposure Control Program (HLT-2008), and it addresses the requirements of the MIOSHA Part 305 Asbestos Standards, 29 CFR 1910.1001 (General Industry) and MIOSHA Part 602 Asbestos Standards, 29 CFR 1926.1101 (Construction Industry).

1.3. Employees working in and around facilities with asbestos or asbestos-containing material, but who do not remove or abate the asbestos, are covered under the general industry requirements. Construction-related activities refer to those activities associated with: removal or encapsulation of materials containing asbestos; demolition or salvage of structures where asbestos is present; construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos; installation of products containing asbestos; asbestos spill/emergency cleanup; transportation, disposal, storage, or containment of asbestos on the site or location at which construction activities are performed.

2. Scope

2.1. This procedure applies to all persons, including all visitors, service contractors, custodial staff, non-construction maintenance workers and general contractors working on MRD property. Engineering or Maintenance Department representatives shall inform all contractors of this procedure before accepting bids for planned work, prior to commencing unscheduled work and before permitting a contractor to begin work at the MRD.

2.2. The MRD Safety Supervisor is designated as the administrator of this plan and is responsible for its implementation following the procedures set forth in Section HS-20 of the HESPPM.

2.3. The plan administrator will identify a "competent person" who is capable of identifying asbestos hazards in the workplace, selecting the appropriate control strategy, and who has the authority to take prompt corrective action to eliminate them. The competent person will have attended a comprehensive course in all aspects of asbestos removal and handling which has been approved by the EPA or the state, or is an equivalent course.

***Note**: A "competent person" is required only for compliance with the Construction Industry Asbestos Standard.*

3. Identification, Evaluation, and Notification

Any employee that finds asbestos material or potential asbestos material on the ground or in a possibly unsafe condition should contact the Safety and Maintenance Department. During non-business-hours, individuals who identify asbestos related concerns should contact their supervisors. The Maintenance Foreman and/or Coordinator is required to coordinate the work for immediate inspection of the material in question by an accredited asbestos inspector.

3.1. COMMON MATERIALS CONTAINING ASBESTOS

3.1.1. The following materials will be presumed to contain asbestos until it can be proven that they do not:

3.1.1.1. Thermal insulation installed in 1980 or before. This includes insulation on steam tracing, hot piping, cold piping with mastic, process vessels and storage tanks.

3.1.1.2. Floor and ceiling tiles installed in 1980 or before.

3.1.1.3. Sprayed-on or troweled-on surfacing materials installed in 1980 or before. This includes sprayed-on fireproofing, ceiling treatments, and foam roofing materials. It does not include spray paint.

3.1.1.4. Concrete sheets (transite). Corrugated concrete sheets are used most frequently in compressor shelters and some cooling towers.

3.1.1.5. All other insulation material in the refinery, unless otherwise noted.

3.1.1.6. Non-metallic Gaskets

3.1.2. The following criteria will be used to rebut the designation of installed material as Presumed Asbestos Containing Material (PACM):

3.1.2.1. Information, data and analysis supporting the determination that PACM does not contain asbestos.

3.1.2.2. A completed inspection conducted pursuant to the requirements of AHERA (40 CFR Part 763, Subpart E) or perform tests of the material containing PACM which demonstrate that no asbestos is present in the material. Such tests shall include analysis of 3 bulk samples of each homogeneous area of PACM collected in a randomly distributed manner. The tests shall be conducted by a Certified Industrial Hygienist or an accredited inspector. Analysis of the samples shall be performed by persons or laboratories with proficiency demonstrated by current successful participation in a nationally recognized testing program.

3.1.3. All of the materials listed in 3.1.1 can be shown to be asbestos free only by testing. Any material with more than one percent (1%) asbestos by volume is considered to contain asbestos

3.1.4. Asbestos free insulation that has been tested or newly installed is labeled with blue colored bands and a sticker indicating the insulation is "Asbestos Free". Other listed materials are either labeled or, for materials found in buildings, identified on a notice posted in prominent common areas within the buildings**. If the material is not labeled or tagged, then it must be considered to contain asbestos, unless testing proves otherwise.**

3.1.5. Thermal insulation that is newly installed must be labeled using blue bands and stickers to identify that the new insulation as "Asbestos Free." Labels shall be placed on the outer most visible layer.

3.2. IDENTIFICATION OF ASBESTOS

3.2.1. **The location of all asbestos or asbestos-containing material (ACM) must be determined before beginning any work that may contact or disturb it regardless of whether the work is conducted by Maintenance, Operations or Contractors. The only exception is if the material is assumed to be asbestos and is treated as such. To determine a material's asbestos content either:**

3.2.1.1. Check to see if the material has already been tested. The material may be tagged and/or labeled, or a notification sheet may be posted in common areas of buildings, OR

3.2.1.2. Arrange for an asbestos inspector to determine the asbestos content of the material, according to their written procedures and the State of Michigan's procedures. Inspections, and sample collection, if necessary, must follow the requirements in OSHA's Construction Standard for Asbestos.

3.2.2. Once the asbestos content of the material has been determined, the work can begin. All asbestos-removal jobs must be arranged through the Maintenance Department.

3.3. ASBESTOS SURVEY

3.3.1. A survey was conducted of all facilities to determine the location of ACM and PACM. Continuing identification of ACM and PACM will be made by an industrial hygienist or by a person whose skill and experience with respect to identification of asbestos hazards is equivalent and can be demonstrated as such.

3.4. UPDATING THE ASBESTOS SURVEY

3.4.1. To maintain the validity of the asbestos survey, the following is required:

3.4.1.1. Blue bands and labels are placed on newly installed insulation to indicate that it is asbestos free. Labels shall be placed on the outer most visible layer. It is the responsibility of Operations and Project Managers to ensure that new insulation is immediately labeled.

3.4.1.2. Runs of pipe that have areas of both abated and intact asbestos will use a combination of blue banding and red bands or stickers to distinguish the asbestos-free zones from those which still contain asbestos.

3.4.1.3. ACM found in buildings is not labeled or tagged unless required to be. Instead, those materials are identified on a sign posted in public areas. Notify the Safety Department prior to removing materials in buildings that are either known to be ACM, are neither tagged nor labeled, or if a building does not contain a posted sign. It is the Safety Department's responsibility to ensure the building surveys are updated and new signs posted.

3.5. LABELING & WARNING SIGNS

3.5.1. At the entrance of mechanical equipment rooms or areas in which employees reasonably can be expected to enter and which contain TSI and surfacing ACM and PACM, signs will be posted which identify the material which is present, its location and appropriate work practices.

3.5.2. Warning signs that demarcate regulated areas will be posted at an appropriate distance to allow employees to take necessary protective steps before entering the area marked by the signs. The warning signs will read:

DANGER ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY
WEAR RESPIRATORY PROTECTION AND
PROTECTIVE CLOTHING IN THIS AREA

3.5.3. Labels will be affixed to all products and containers containing asbestos, including waste containers. Where feasible, installed asbestos products will contain a visible label. Labels will be printed in large bold letters on a contrasting background and will contain the following information:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

3.5.4. Labels are not required when asbestos fibers have been modified by a bonding agent, coating, binder, or other material, provided that the manufacturer can demonstrate that, during any reasonably foreseeable use, handling, storage, disposal, processing or transportation, no airborne concentrations of asbestos fibers in excess of the permissible exposure limits will be released. Labels are also not required when asbestos is present in the product in concentrations less than one percent (1%) by weight.

3.5.5. A Safety Data Sheet for asbestos-containing materials is available for employee reference per the MIOSHA Hazard Communication Standard.

3.6. ASBESTOS REMOVAL NOTIFICATION

3.6.1. Maintenance Planners will notify the asbestos abatement contractor when they need to arrange for removal or repair of any quantity of asbestos. Asbestos removal requires at least 15 days notification to the Maintenance Planners and the asbestos abatement contractor to properly schedule the work.

3.6.1.1. Asbestos abatement contractors, along with the maintenance planners, will conduct a walkthrough of the area of asbestos work to complete the MRD ACM Job Notification (Attachment A) and the asbestos abatement contractors will submit to the electronic filing system (Verdant) when walkthrough is complete.

3.6.2. Operations Foremen will notify their employees when asbestos is being disturbed in their complex or in adjacent areas. Similarly, the Maintenance Foremen will notify their employees when asbestos is being disturbed in the areas that their employees may be assigned or in adjacent areas. For engineering jobs that involve asbestos removal, the asbestos abatement contractor will notify the appropriate Maintenance Foreman who, in turn, will notify his/her employees. Employees to be notified include all contractors in the respective work area.

3.6.3. All asbestos will be handled and removed only by licensed asbestos contractors. The asbestos abatement contractor will notify the Michigan Department of Environmental Quality (MDEQ) and Michigan Department of Licensing and Regulatory Affairs (LARA) as required prior to removal. The asbestos abatement contractor must send a copy of the notification to the Environmental Department before beginning the asbestos removal. Contact the Environmental Department for a copy of the MDEQ notification form.

3.6.4. The asbestos abatement contractor must make sure that all of the following have been completed and are true.

3.6.4.1. The MDEQ notification shall be made at least ten working days prior to the commencement of work. A working day means Monday through Friday and including holidays that fall on any of the days Monday through Friday.

3.6.4.1.1. The notification shall be updated and resubmitted to the agency if the scheduled asbestos removal dates change or the amount of asbestos changes according to the following:

3.6.4.2. If amount of asbestos changes by at least 20 percent, an updated notification must be submitted at least ten days prior to starting removal.

3.6.4.3. If removal will begin on a date later than the original start date, a re-notification is required no later than the original start date.

3.6.4.4. If removal is to begin before the original start date, a re-notification is required at least ten days prior to the start.

3.6.4.5. During emergency operations, asbestos may be removed without the ten working day advance notice. A licensed asbestos abatement contractor must complete the removal. Notification shall be made as early as possible, but not later than the following working day. The notification must include the date and time the emergency occurred, a description of the emergency event, and an explanation of how the event caused an unsafe condition, or would cause equipment damage or an unreasonable financial burden. An emergency operation is defined as an operation that was not planned but results from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, is necessary to protect equipment from damage, or is necessary to avoid imposing an unreasonable financial burden. This includes operations necessitated by non-routine failures of equipment. **Failure to properly plan work so that the minimum notification time (10 days) can be met does not constitute an emergency.**

3.6.4.6. Demolition activities also require a removal notification to be submitted, even if there is no asbestos at the demolition site. The notification requirements are the same as outlined above. Demolition activity is defined as a project that includes the wrecking or removal of a load-supporting wall, beam or component, including steel supports for outdoor pipe racks. The Environmental Department will handle questions and clarifications in regards to demolition activities.

3.6.4.7. Ensure that the Notification is completely filled out, including facility age, present use and prior use.

3.7. ASBESTOS REMOVAL OR REPAIR

3.7.1. The Asbestos abatement contractor is responsible for following all applicable local, state and federal requirements that pertain to asbestos removal and the MRD's safety procedures including the completion of a safe work permit for all jobs.

3.7.2. Once abatement or repair is completed, the Asbestos Abatement Contractor is responsible for submitting all required documentation outlined in the MRD ACM Job Documentation Needed (Attachment B) to the electronic tracking system (Verdant) no later than 30 days from completion of work.

3.8. EMPLOYEE EXPOSURE MONITORING

3.8.1. Determinations of employee exposure will be made from breathing zone air samples that are representative of the 8-hour time-weighted average (TWA) and 30-minute short term level.

3.8.2. The OSHA Permissible Exposure Limit (PEL) for asbestos is 0.1 fiber per cubic centimeter of air for an 8-hour work shift with an excursion limit of 1.0 fiber per cubic centimeter of air averaged over a sampling period of 30 minutes.

***Note**: Guidance on the specific details of the air monitoring method can be found in the Industrial Hygiene Measurement Procedures Manual.*

3.8.2.1. For construction-related exposure monitoring, it will consist of one or more samples representing full shift exposure for employees in each work area. Also, one or more samples will be taken in each work area to evaluate the short term exposure during operations which are most likely to exceed the PEL.

3.8.2.2. For general industry-related activities, representative full-shift measurements will be made by taking one sample for each shift for each employee in each job classification in each work area. Also, one or more short-term samples will be taken for each shift, each job classification, and each work area during operations that are most likely to exceed the PEL.

3.8.3. **INITIAL ASSESSMENTS AND MONITORING**

3.8.3.1. An industrial hygiene assessment will be conducted to determine if there is employee exposure in excess of the PEL. The initial assessment will consist of one or more of the following: air monitoring (if feasible), observations, information, calculations, or previous monitoring.

3.8.3.2. For construction-related activities, the initial exposure assessment will be made by a competent person immediately before or at the initiation of the operation.

3.8.3.3. For Class I asbestos work, i.e., removal of TSI and surfacing ACM or PACM, unless current or previous air monitoring demonstrates otherwise or objective data demonstrates that the material cannot release fibers in excess of the PEL under worst case conditions, it will be presumed that employees are exposed in excess of the PEL.

3.8.3.4. A "negative exposure assessment" can be used to demonstrate the exposure is within the limits for specific asbestos jobs and where employees have been trained in compliance with the standard. The "negative exposure assessment" is made using objective data or current/prior (within 12 months of the current or projected job) monitoring under conditions closely resembling those which will prevail.

***Note**: The use of these criteria requires a high degree of certainty that employee exposures will not exceed the established limits.*

3.8.3.5. No initial monitoring is required under the general-industry standard if objective data demonstrates that asbestos is not capable of being released in concentrations exceeding the established limits under expected uses of processing, use or handling.

3.8.3.6. Air monitoring conducted after March 31, 1992 will be used to satisfy the general-industry initial monitoring requirement.

3.8.4. **PERIODIC MONITORING**

3.8.4.1. For construction-related Class I and II operations, daily monitoring will be conducted, unless a negative exposure assessment has been made for the entire operation. The ONLY exception to the daily monitoring requirement is if ALL of the following apply:

3.8.4.1.1. Positive pressure supplied air respirators are used,
3.8.4.1.2. A competent person supervised all installation and operation of the control systems,
3.8.4.1.3. Critical barriers are utilized,
3.8.4.1.4. And HVAC systems must be isolated in the regulated area by sealing with a double layer of 6 mil plastic or the equivalent.

3.8.4.2. For operations other than Class I or II, periodic monitoring will be conducted of all work where exposures are expected to exceed the PEL.

3.8.4.3. For general industry exposure, periodic monitoring will be conducted at a frequency that does not exceed 6 months where exposures may reasonably be foreseen to exceed the PEL.

3.8.5. **ADDITIONAL MONITORING**

3.8.5.1. Additional monitoring will be conducted whenever there has been a change in the production, process, control equipment, personnel or work practices that may result in new exposures above the PEL or when there is any reason to suspect that a change may result in new or additional exposures above the PEL.

3.8.6. TERMINATION OF MONITORING

3.8.6.1. Monitoring can be discontinued for those employees whose exposure is represented by the monitoring when it can be shown statistically that exposures are within the PEL.

***Note**: OSHA has not defined what a "statistically reliable measurement" would involve. An interpretation is expected in the near future.*

3.8.6.2. All monitoring is conducted in accordance with MPCs Exposure Assessment Methodology (EXAM) process and procedures.

3.8.6.3. For general industry work, employees will be notified in writing within 15 days after obtaining the monitoring result. For construction industry work, employees will be notified within 5 days after obtaining the monitoring result.

3.8.6.4. Employees and collective bargaining unit representatives are advised of their right to observe the monitoring conducted pursuant to this plan.

3.8.6.5. Exposure monitoring results are retained and can be requested from the MRD Industrial Hygienist.

3.8.7. POST ABATEMENT AIR MONITORING CHECK

3.8.7.1. The Michigan Asbestos Abatement Contractors Licensing Act 135 of 1986 requires that a building or structure owner or lessee shall have a post abatement air monitoring check performed by a qualified neutral party completely independent of the asbestos abatement contractor at all asbestos abatement project sites involving a negative pressure enclosure as specified by 29 C.F.R. 1926.1101(g)(5)(i) that involve 10 or more linear feet or 15 or more square feet of friable asbestos materials.

3.8.7.2. Whenever feasible, unless waived by the plan administrator, the post abatement air monitoring check required by this section shall make use of aggressive air sampling methods as described in unit III.B.7.d. to appendix A to subpart E of part 763 of title 40 of the code of federal regulations.

3.8.7.3. After completion of the asbestos abatement project, the level of asbestos fibers per cubic centimeter of air that are more than 5 micrometers in length when sampled and analyzed according to NIOSH Method 7400 (Asbestos and Other Fibers by PCM), and shall not exceed 0.05 asbestos fibers at the asbestos abatement project site.

3.9. WASTE DISPOSAL

3.9.1. In all cases asbestos must be placed in a minimum of two bags. In the case of glove bags, the glove bag itself may be counted as one disposal bag.

3.9.2. All asbestos disposal bags shall have an asbestos label with MPC's name and address placed on the outside of the bag. After bagging, all asbestos waste must be placed in enclosed containers labeled for asbestos waste. No non-asbestos waste may be placed in these containers. Asbestos contractors must ensure that all containers have a "DANGER" sign, affixed to the outside, with the following words in accordance with section 3.5.3 of this procedure.

3.9.3. All waste must be transported in a secure manner, which prevents loss of content or damage that could result in environmental contamination. All trucks must be marked with the number nine (9) DOT Diamond, and shall be marked with a 20" x 14" warning sign in accordance with section 3.5.3 of this procedure.

3.9.4. The Environmental Waste Coordinator will be responsible for all paperwork accompanying waste shipments. Waste coordinator must ensure that all information on the manifest is filled out, including shipper's information (including address and telephone number). All asbestos waste shall be disposed of in accordance with EPA and MDEQ regulations. The Waste Coordinator shall designate the waste disposal facility. Pre-printed manifests are available from the waste coordinator.

4. Engineering Controls, Work Practices, Regulated Areas, and PPE

4.1. GENERAL INDUSTRY REQUIREMENTS

4.1.1. For general industry exposure, engineering and work practice control measures will be used, to the extent feasible, to maintain employee exposure within the permissible limit. If these controls are not sufficient to reduce levels to within the PEL, controls will be used to reduce exposures to the lowest level obtainable and the personnel will be provided with respiratory protection.

4.1.2. The following general industry control measures will be used as appropriate: local exhaust ventilation and dust collection systems, i.e., Fundamentals Governing the Design and Operation of Local Exhaust Systems, AIHA Z9.2-2006; local exhaust systems for all hand-operated and power-operated tools such as saws, scorers, abrasive wheels, and drills; insofar as practicable, handling, mixing, applying, removing, cutting, scoring, or otherwise working asbestos in a wet state; wetting, enclosing or ventilating operations that involve asbestos cement, mortar, coating, grout, plaster, or similar material when removing from bags, cartons, or other containers in which they are shipped.

4.1.3. Compressed air will not be used to remove asbestos or materials containing asbestos unless used in conjunction with an effective dust collection system and there will be no sanding of asbestos-containing flooring material.

4.1.4. A written compliance program will be developed when the permissible exposure limits are exceeded and it will address engineering and work practice controls and respiratory protection. Employee rotation will not be used as a means of compliance. This program shall be reviewed and updated as necessary.

4.1.5. Specific engineering and work practice controls will be used for brake and clutch repair including a negative pressure enclosure/HEPA vacuum system or low pressure/wet cleaning or an equivalent method. When no more than five pairs of brakes/clutches are handled per week, a wet method of controlling dust can be used.

4.2. CONSTRUCTION INDUSTRY REQUIREMENTS

4.2.1. The following engineering controls and work practices will be used regardless of the levels of exposure: vacuum cleaners equipped with HEPA filters; wet methods or wetting agents (except where it has been demonstrated that the use of wet methods is infeasible); and prompt clean-up and disposal of wastes and debris in leak-tight containers.

4.2.2. In addition to the above, the following control methods will be used to achieve compliance with the PEL: local exhaust ventilation equipped with HEPA filter dust collection systems; enclosure/isolation of processes producing asbestos dust; ventilation of regulated area; and, wherever controls are not sufficient to reduce exposure to or below the exposure limits, they shall be used to reduce exposure to the lowest levels attainable and shall be supplemented by the use of respiratory protection.

4.2.3. The following work practices and engineering controls are prohibited: high-speed abrasive disc saws (not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air); compressed air (unless used in conjunction with an enclosed ventilation system); dry sweeping, shoveling or other dry clean-up of dust and debris containing ACM/PACM; employee rotation as a means of reducing employee exposure to asbestos.

4.2.4. The specific requirements for the different construction classifications will be followed.

4.2.5. **CLASS I WORK REQUIREMENTS**

4.2.5.1. For Class I asbestos work, work will be supervised by a competent person; HVAC systems isolated in the regulated area; impermeable drop cloths shall be placed on surfaces beneath all removal activity; all objects within the regulated area will be covered with impermeable drop cloths or plastic sheeting; where a negative exposure assessment cannot be produced or where exposure monitoring shows that the PEL is exceeded; the regulated area shall be ventilated to move contaminated air away from the breathing zone of employees toward a HEPA filtration or collection device.

4.2.5.2. When more than 25 linear or 10 square feet of TSI or surfacing material is removed, or where a negative exposure assessment cannot be produced, or where employees are working in areas adjacent to the regulated area, either critical barriers shall be placed over all openings to the regulated area, or another barrier or isolation method which prevents the migration of airborne asbestos from the regulated area shall be used. Perimeter area surveillance and perimeter area monitoring will be conducted.

4.2.5.3. One or more of the following specific control methods will be used in accordance with the specifications and work practices contained in the Standard:

4.2.5.3.1. Negative Pressure Enclosure systems where the configuration of the work area does not make the erection of the enclosure infeasible.

4.2.5.3.2. Glove bags for straight runs of piping.

4.2.5.3.3. Negative Pressure Glove Bag Systems for piping.

4.2.5.3.4. Negative Pressure Glove Box Systems for pipe runs.

4.2.5.3.5. Water Spray Process System for cold line piping.

4.2.5.3.6. A mini-enclosure (which accommodates no more than two persons) may be used if the disturbance or removal can be completely contained by the enclosure.

Note: If alternate control methods are used, the standard's provisions will be met.

4.2.6. CLASS II WORK REQUIREMENTS

4.2.6.1. For Class II asbestos work, the work will be supervised by a competent person, impermeable drop cloths shall be placed on surfaces beneath all removal activity, and the work prohibitions specified in the OSHA standard will be observed.

4.2.6.2. For indoor Class II jobs, where a negative exposure assessment cannot be produced, or where changed conditions during the job indicate there may be exposure above the PEL, or where the ACM is not removed in a substantially intact state, either critical barriers shall be placed over all openings to the regulated area, or another barrier or isolation method will be used and perimeter area monitoring or clearance monitoring used to verify that airborne asbestos has not migrated from the regulated area.

4.2.6.3. Specific controls are required for certain Class II operations including vinyl and asphalt flooring materials, roofing material, cementitious asbestos-containing siding and shingles or transite panels, and gaskets.

4.2.6.4. When removing any other Class II material for which specific controls have not been listed, the following practices will be followed:

4.2.6.4.1. Wetting with amended water prior to and during removal

4.2.6.4.2. Removal in intact state if possible

4.2.6.4.3. No cutting, abrading or breaking unless other methods are not feasible

4.2.6.4.4. ACM immediately bagged/wrapped or kept wetted until transferred to closed receptacle (no later than the end of the shift).

4.2.6.4.5. Alternative engineering and work practice controls may be used if it can be demonstrated that exposure will not exceed the established limits under any anticipated circumstances or if a competent person certifies that different or modified controls are adequate to reduce employee exposure within the exposure limits under all expected conditions of use.

4.2.7. CLASS III WORK REQUIREMENTS

4.2.7.1. For Class III asbestos work the following methods will be used: wet methods, local exhaust ventilation (to the extent feasible), impermeable dropcloths (where the disturbance involves drilling, cutting, abrading, sanding, chipping, breaking, or sawing of thermal system insulation or surfacing material) and isolation using mini-enclosures or glove bag systems.

4.2.7.2. Where a negative exposure assessment is not produced, or where monitoring results show the PEL has been exceeded, the area will be contained using impermeable drop cloths and plastic barriers (or their equivalent), or the operation shall be isolated using one of the specific control methods for Class I work.

4.2.7.3. Appropriate respirators will be used for jobs which involve the disturbance of TSI or surfacing material, or where a negative exposure assessment is not produced, or where monitoring results show a PEL has been exceeded.

4.2.8. CLASS IV WORK REQUIREMENTS

4.2.8.1. All Class IV jobs will use wet methods, HEPA vacuums, and result in prompt clean-up of debris containing ACM or PACM.

4.2.8.2. Employees cleaning up debris and waste in a regulated area will wear appropriate respirators.

4.2.8.3. Waste and debris in areas where friable TSI or surfacing material is accessible will be assumed to contain asbestos.

4.3. REGULATED AREAS

4.3.1.1. Regulated areas will be established for all Class I, II and III asbestos work and for all other asbestos operations where airborne concentrations of asbestos exceed, or there is a reasonable possibility that they may exceed, a permissible exposure limit.

4.3.1.2. Competent persons will supervise all asbestos work performed within the regulated area.

4.4. HYGIENE FACILITIES AND PRACTICES

4.4.1. The requirements for hygiene facilities and hygiene practices are determined by the exposure level (general industry) and class of work to be conducted/quantity of asbestos (construction industry).

4.4.2. For general industry activities, when exposure exceeds the established limits, the following will be provided: change rooms, showers, separate lunchrooms with special ventilation, good personal hygiene (washing hands and face prior to eating, drinking, or smoking).

4.4.3. Contaminated clothing and equipment will not leave the work area at the end of the shift and clothing will be thoroughly vacuumed prior to entering lunchroom facilities. Employees exposed to asbestos in excess of the established limits will shower at the end of the shift.

4.4.4. For construction industry activities the following will be provided:

4.4.5. For Class I jobs, greater than 25 linear feet (or 10 square feet) of TSI or surfacing ACM, PACM: decontamination areas, equipment room, shower area, clean change room, decontamination area entry and exit procedures, and lunch areas.

4.4.5.1. If it is not feasible to locate the shower adjacent to equipment and clean rooms, or where the work is performed outdoors, the employees will remove the contamination from work clothing with a HEPA vacuum and proceed to the shower location, or remove the contaminated work clothing in the equipment room and don clean clothing and proceed to the shower location.

4.4.5.2. Similarly, clean change rooms can be provided remote from the work area as long as employees use a HEPA vacuum to remove contamination when leaving the regulated area and then proceed to a shower/clean change room location.

4.4.5.3. Lunch areas will be locations where asbestos levels are below established exposure limits and where there is no surface contamination with asbestos fibers.

4.4.6. For Class I jobs, less than the above quantities, and for Class II and III jobs where exposures exceed the established limits or no negative exposure assessment was made: equipment room/area, HEPA vacuum cleaning of work clothing before removal, cleaning of equipment and surfaces of containers filled with ACM before removal from equipment room/area, entry and exit from the regulated area shall be through the equipment room/area.

4.4.7. For Class IV jobs within a regulated area, the hygiene practices will comply with the practices of the employees in Class I, II, or III jobs, as appropriate. If TSI or surfacing ACM/PACM is involved decontamination facilities will also be provided.

4.4.8. No smoking is to be permitted in any work area.

4.5. PERSONAL PROTECTIVE CLOTHING AND EQUIPMENT

4.5.1. Appropriate protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves and foot coverings will be provided for employees exposed to asbestos exceeding the PEL. Protective clothing will also be worn when a required negative exposure assessment is not produced (construction standard) and for Class I operations involving the removal of over 25 linear or 10 square feet of TSI or surfacing ACM and PACM.

4.5.2. Laundering of contaminated clothing will be done to prevent the release of airborne asbestos in excess of the PEL. If contaminated clothing is provided to another person for laundering, that person will be informed of this requirement.

4.5.3. Contaminated clothing will be transported in sealed impermeable containers and be properly labeled.

4.5.4. The competent person (construction standard) will inspect protective clothing worn by employees at least once per work shift for rips or tears. Clothing that is ripped or torn will be immediately repaired or the work suit will be immediately replaced.

4.5.5. For general industry, employees will remove work clothing contaminated with asbestos only in change rooms and only authorized employees may take contaminated work clothing out of the change room.

4.5.6. Additional information on the types of clothing and equipment used for protection against asbestos and the laundering or disposal of contaminated clothing can be obtained by contacting the MRD Safety group.

4.6. RESPIRATORY PROTECTION

4.6.1. Active covered employees are included in the component's Respiratory Protection Plan which has been developed pursuant to the MRD Respiratory Protection Plan.

4.6.2. Whenever a negative pressure filter respirator is used, a powered air-purifying respirator shall be made available whenever an employee chooses to use this type respirator.

4.6.3. Initial and periodic (at least annually) fit testing shall be conducted. Qualitative fit testing shall only be used for half mask respirators. An exception to this is in the construction-industry where full-face piece respirators can be fit tested with qualitative methods if exposures do not exceed 1 fiber per cubic centimeter. Otherwise, quantitative fit testing is required.)

Note: The Portacount fit tester can be used for quantitative fit testing.

4.6.4. In addition, for the following construction-related activities, special respirator requirements apply. Respirators shall be used:

4.6.4.1. During all Class I asbestos jobs.

4.6.4.2. During all Class II jobs where ACM is not removed in a substantially intact state.

4.6.4.3. During all Class II and III jobs which are not conducted using wet methods.

4.6.4.4. During all Class II and III jobs where there is no "negative exposure assessment".

4.6.4.5. During all Class III jobs where TSI or surfacing ACM/PACM is disturbed.

4.6.4.6. During all Class IV jobs within regulated areas (when other jobs requiring respirator use are conducted in these areas).

4.6.5. Also, only full-facepiece supplied-air respirators operated in the pressure demand mode and equipped with an auxiliary positive pressure self- contained breathing apparatus shall be used in Class I areas (unless a negative exposure assessment was made).

5. Medical Surveillance, Hazard Communication, and Training

5.1. COVERED EMPLOYEES

5.1.1. An employee is included in the plan when industrial hygiene monitoring of any work operation which involves regular or periodic asbestos exposure confirms results above the PEL. An employee is also included in the plan when conducting Class I, II, or III work activities for a combined total of 30 or more days in a year, or were they wear negative pressure respirators in connection with construction-related asbestos activities. The plan also covers those employees involved in Class IV work activities.

5.1.2. An employee is removed from the plan upon termination of employment and a medical examination is provided within 30 days before or after the date of termination.

5.1.3. An employee may be reclassified as an inactive covered employee in the plan when there is no confirmed exposure above the PEL for a period of six months. This may occur when an employee is transferred to another assignment or when no further asbestos insulation removal is contemplated.

5.1.4. An inactive covered employee is provided continuing medical examinations as described in the Medical Surveillance section of this plan.

5.1.5. A listing of covered employees is maintained by the MRD Industrial Hygienist and provided to MRD medical personnel.

5.2. MEDICAL SURVEILLANCE

5.2.1. Covered employees are required to have an Initial Asbestos Medical Surveillance Examination prior to assignment to areas where airborne asbestos fiber levels exceed the PEL, or for construction-related activities, within 10 working days following the thirtieth day of exposure. The examination will meet the requirements of the OSHA Asbestos Standards and include: a medical and work history with emphasis on the pulmonary, cardiovascular, and gastrointestinal systems and completion of the OSHA Initial Medical Questionnaire, Form 1825; physical examination of all systems with emphasis on the same three systems; a chest x-ray, pulmonary function tests, (FEV1 and FVC), and any other tests/examinations deemed appropriate by the examining physician.

5.2.2. Periodic medical surveillance will be performed on an annual basis and will include the same requirements as above, except that the OSHA Periodic Medical Questionnaire, Form 1826, is administered and the chest x-ray (general industry only) will be performed according to the following schedule:

	Age of Employee		
	15 - 35	35+ to 45	45+
Years Since First Exposure	Periodic Medical Surveillance	Periodic Medical Surveillance	Periodic Medical Surveillance
0-10	Every 5 years	Every 5 years	Every 5 years
10+	Every 5 years	Every 2 years	Every 1 year

5.2.3. Within 30 days of termination of employment, a covered employee is required to have an Asbestos Medical Surveillance Examination unless he or she has had such an examination within the past 12 months.

Note: The construction industry standard does not require termination examinations.

5.2.4. Employees, who are reclassified as inactive covered employees, are required to have periodic follow-up medical surveillance as part of the Company's periodic health maintenance evaluation program. Every five years, after examination and consultation with a clinician, the employee will be offered a chest x-ray. If they choose to have the x-ray, Marathon will continue to cover the cost once every five years. However, if after discussing the risks vs. benefits of the chest x-ray, the employee decides not to have one, and it will not be required.

5.2.4.1. All Ages - Every 5 Years - Examination and consultation with a clinician.

5.2.5. Health Services reviews the results of the medical surveillance examinations and, through consultation with Component Management, informs the employee of the results, including the examining physician's written opinion, within 30 days of their receipt.

5.2.6. Covered employees are included in MRD Respiratory Protection Plan and are also subject to the medical surveillance requirements of MPC Employee Health Monitoring Examination Protocols Standard (HLT-2025-DN).

5.2.7. Specific information is provided to the attending physician as follows: a copy of the OSHA Standard, a description of the covered employee's duties, results of exposure measurements or anticipated exposure level, a description of personal protective or respiratory protective equipment, and information from previous medical examinations.

5.3. HAZARD COMMUNICATION

5.3.1. If employees, contractors and contractors applying for bidding work can reasonably be expected to work in or adjacent to areas containing ACM or PACM, notification will be made to them either in writing or by a personal communication of the presence, location and quantity of such material. Building tenants who will occupy areas containing such material will also be notified. (For general industry, contractors and/or employees will be informed about the presence and location of ACM/PACM, with records maintained of the presence location and quantity of ACM/PACM for the duration of the ownership. Housekeeping personnel will be informed of the presence and location of ACM/PACM.)

5.3.2. Before asbestos work is begun, employees/contractors who work in or adjacent to areas where ACM/PACM is located will be informed of the location and quantity of ACM and PACM present in the area and the precautions to be taken to insure that airborne asbestos is confined to the area.

5.3.3. Within 10 days of completion of asbestos work, the employer conducting asbestos work (Marathon or the asbestos contractor), will inform the Plan Administrator/competent person and employers of employees who will be working in the area of the current location and quantity of PACM and ACM remaining in the area and final monitoring results, if any.

5.3.4. If ACM and PACM are newly discovered on a worksite, information concerning the presence, location and quantity will be provided to the Plan Administrator/competent person and to other employers of employees working at the work site within 24 hours of the discovery.

5.4. TRAINING

5.4.1. Prior to or at the time of initial assignment to work requiring inclusion in the plan, and annually thereafter, covered employees are required to attend a training program that includes: methods of recognizing asbestos, including the requirement to presume that certain building materials contain asbestos; the health effects associated with asbestos exposure; the relationship between smoking and asbestos in producing lung cancer; the nature of operations that could result in exposure to asbestos, the importance of necessary protective controls to minimize exposure including, as applicable, engineering controls, work practices, respirators, housekeeping procedures, hygiene facilities, protective clothing, decontamination procedures, emergency procedures, and waste disposal procedures, and any necessary instruction in the use of these controls and procedures, including where Class III and IV work is performed, the contents of "Managing Asbestos in Place (EPA 20T-2003, July 1990) or its equivalent in content; the purpose, proper use, fitting instructions and limitations of respirators; the appropriate work practices for performing the asbestos job; medical surveillance program requirements; the content of the OSHA standard, including appendices; the names, addresses and phone numbers of public health organizations which provide information, materials, and/or conduct programs concerning smoking cessation; the requirements for posting signs and affixing labels and the meaning of such signs and labels.

5.4.2. All training materials shall be made readily available to affected employees and to OSHA upon request. Employees shall be advised of the availability of self-help smoking cessation program materials. The distributed material shall consist of NIH Publication No. 89-1647 or equivalent.

5.4.3. The training program shall be instituted for all employees who are exposed at or above the PEL and for those employees who install asbestos containing products and for all employees who perform Class I through IV asbestos operations. Employee participation in the program shall be ensured.

5.4.4. Construction Related

5.4.4.1. Training for Class I and II operations shall be the equivalent in curriculum, training method and length to the EPA Model Accreditation Plan asbestos abatement worker training (40 CFR Part 763, Subpart E, Appendix C).

5.4.4.2. Training for Class III employees shall be the equivalent in curriculum and training method to the 16-hour Operations and Maintenance course developed by the EPA (40 CFR 763.92(a)(2)). Such course shall include hands-on training in the use of respiratory protection and work practices and shall take at least 16 hours.

5.4.4.3. Training for Class IV employees shall be the equivalent in curriculum and training method to the awareness training course developed by the EPA (40 CFR 763.92(a)(1)). Such course shall include available information concerning the locations of PACM and ACM and instruction in recognition of damage, deterioration and delamination of asbestos containing building materials. The course duration shall be at least 2 hours.

5.4.5. Additional information on the employee information and training program is maintained by the MRD training department.

6. Records Retention

6.1. The following files are maintained in connection with the administration of this plan:

6.2. Contractor Requirements

6.2.1. The Purchasing Department and HESS Department shall receive copies of the asbestos contractors' license and ensure that the contractor is qualified. Copies of the license certified by the Michigan Department of Public Health must be in the MRD files prior to commencement of any project.

6.2.2. The asbestos abatement contractor shall make the following records available for audit upon request of the MRD or state/federal agencies.

6.2.2.1. Employee and EPA training records (certifications, etc.),

6.2.2.2. Air monitoring results, and

6.2.2.3. Asbestos removal license (State of Michigan, etc.).

6.2.3. The asbestos abatement contractor shall submit all abatement or repair documentation specified in MRD Asbestos Material Job Documentation Needed (Attachment B) to the electronic filing system (Verdant) no later than 30 days from completion of work.

6.3. Owner Requirements: Asbestos Survey Results

6.3.1. This includes records of surveys to identify the location of ACM, objective data to demonstrate (where appropriate) that the ACM was not capable of producing exposure in excess of the established limits and thereby demonstrate an exemption from the standard, and data to rebut the PACM (construction industry), where appropriate.

6.3.2. Covered Employee List

6.3.3. Employee Exposure Monitoring

6.3.4. Employee Exposure Monitoring and Medical Surveillance Notifications

6.3.5. Employee Health Status Summaries

6.3.6. Employee Training Records

6.3.7. Notifications by Building Owners Regarding ACM and PACM

6.4. The above files will be maintained until this plan is formally discontinued at which time legal counsel will recommend procedures for proper retention of required records. Procedures have been established whereby Industrial Hygiene and Health Services will maintain files of employee exposure and medical records for the retention periods required by the OSHA Asbestos and Access to Employee Exposure and Medical Records Standards.

6.5. Records are made available to employees, former employees, their designated representatives, and governmental agencies in accordance with the Access To Employee Exposure and Medical Records guideline (HESPPM, HS-11).

7. Definitions

7.1. **Amended Water** – water which has had a surfactant (i.e. soap) added to it.
7.2. **Asbestos** – Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos and actinolite asbestos.
7.3. **Asbestos Containing Material (ACM)** – Any material containing more than 1% of asbestos by weight. Exception: California is 0.1% by weight.
7.4. **Class I Asbestos Work** – Activities involving the removal of thermal system insulation and surfacing ACM and PACM.
7.5. **Class II Asbestos Work** – Activities involving the removal of ACM which 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.
7.6. **Class III Asbestos Work** – Repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.

7.7. **Class IV Asbestos Work –** Maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, III activities.

7.8. **Covered Employee** – An employee included in the Plan when Industrial Hygiene monitoring of any work operations, which involves regular or periodic asbestos exposure, confirms results above 0.1 fiber per cubic centimeter. Covered employee also includes an employee assigned to an asbestos insulation removal task where exposure could exceed 0.1 fiber per cubic centimeter.

7.9. **Critical Barrier** – one or more layers of plastic sealed over all opening into a work area or any other similarly placed physical barrier sufficient to prevent airborne asbestos in a work area from migrating to an adjacent area.

7.10. **Demolition** – the wrecking or taking out any load supporting structural member and any related razing, removing, or stripping of asbestos products.

7.11. **Disturbance** – any activity that disrupts the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM.

7.12. **Employee** – Any Marathon employee, including full-time, part-time, student co-ops, interns, casual or seasonal.

7.13. **Fiber** – A particulate form of asbestos 5 micrometers or longer, and with a length to diameter ratio of at least 3 to 1.

7.14. **Glovebag** – not more than 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.

7.15. **High-Efficiency Particulate Air (HEPA)** – a filter capable of trapping and retaining at least 99.97% of all mono-dispersed particles of 0.3 micrometers in diameter.

7.16. **Homogeneous Area** – an area of surfacing material or thermal system insulation that is uniform in color and texture.

7.17. **Inactive Covered Employee** – An employee whose current position does not involve working with ACM but whose former position(s) required some work with ACM to the extent that exposure may have exceeded the PELs.

7.18. **MRD** – Michigan Refining Division

7.19. **Negative Exposure Assessment** – A demonstration by the employer that employee exposure during a specific operation will be consistently below the PELs. All negative exposure assessments must be created following the criteria set forth in the applicable regulatory standard (i.e., 29 CFR 1926.1101(f)(2)(iii).

7.20. **Permissible Exposure Limits (PELs)** – The OSHA occupational exposure limits. An eight hour time-weighted average of 0.1 fiber per cubic centimeter of air and an excursion limit not to exceed 1.0 fiber per cubic centimeter of air as averaged over a sampling period of 30 minutes.

7.21. **Presumed Asbestos Containing Material (PACM)** – Any thermal insulation or surfacing material found in buildings, vessels or vessel sections constructed no later than 1980 which has not been analyzed and not determined to be non-asbestos containing material.

7.22. **Regulated Area** – an area established to demarcate areas where Class I, II, II asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; or where airborne concentrations of asbestos may exceed the permissible exposure limit.

7.23. **Removal** – all operations where ACM and/or PACM is taken out or stripped from structures or substrates, and includes demolition operations.
7.24. **Renovation** – the modifying of any existing structure, or portion thereof.
7.25. **Repair** – overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.
7.26. **Surfacing Material** – material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).
7.27. **Thermal System Insulation (TSI)** – ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

8. References

8.1. MPC Asbestos Exposure Control Program (HLT-2008)
8.2. MPC Employee Health Monitoring Examination Protocols Standard (HLT-2025-DN)
8.3. MIOSHA Part 470 Employee Medical Records and Trade Secrets
8.4. MRD Respiratory Protection Plan
8.5. Michigan Asbestos Worker Accreditation Act - Act 440 of 1988, as amended
8.6. Michigan Asbestos Abatement Contractors Licensing Act - Act 135 of 1986, as amended
8.7. Michigan Occupational Safety and Health Act - Act 154 of 1974, as amended
8.8. MIOSHA Standards Part 602, "Asbestos Standard for Construction", (29 CFR 1926.1101)
8.9. MIOSHA Standards Part 305, "Asbestos Standard for General Industry",(29CFR 1910.1001)
8.10. AHERA (40 CFR Part 763, Subpart E)
8.11. NESHAP: 40 CFR Part 61, Subpart M

9. Attachments

9.1. MRD ACM Job Notification – Attachment A
9.2. MRD ACM Job Documentation Needed – Attachment B

10.Document Revision History

Rev. No	Description of Change	Author	Approved By	Rev. Date	Effective Date
13	Revised format of procedure and combined all aspects of Handling & Health Plan.	M. Styes	J. Rabideau	11/30/14	11/30/14
14	Added table of contents, more definitions, clarified content for flow of document, added links for references.	M. Styes	J. Rabideau	11/30/15	12/1/15
15	No content changes updated a few formatting errors.	M. Styes	J. Rabideau	11/15/16	11/15/16
16	Updated for Attachments and Verdant Tracking System requirements	M. Styes	J. Rabideau	03/27/19	03/27/19
17	Updated Attachment B for Excel process	M. Styes	Al Morales	3/30/20	3/30/20

Attachment A - MRD ACM Job Notification

Pre – Job Walkthrough: To be filled out by ACM Competent Person AND MPC Coordinator / OMC / Planner

Location: _____

Equip #/ Bldg. #: _____

Date of Walkthrough: _____

Project / JOB # / WN#: _____

Activity Type: ☐ Abatement ☐ Bulk Sampling ☐ Clearance Testing ☐ Periodic Surveillance
(Check All That Apply) ☐ Inspection / Survey ☐ O&M / Repair / Encapsulation

Company Performing Work: _____

Date ACM work to be performed: _____

Has material been identified as ACM by bulk sampling?

- ☐ Yes, Attach bulk sampling report (with results) to submission
- ☐ No, Conduct Bulk Sampling and follow up with Report
- ☐ No, presumed to be ACM (previously labeled as) and going to treat as if it is

Describe resources needed (i.e. scaffold, JLG) to access material for ACM work: _____

Will there be additional work to be done on equipment after ACM work is completed?

- ☐ Yes, Consider the following:
  - ☐ Will next work crew be able to access the area to be worked on WITHOUT contacting ACM? If no, abate more material
  - ☐ Is there any other ACM in adjacent equipment / piping that should be removed to help with accessibility?
- ☐ No, Only ACM Repair / Abatement is occurring

Will this ACM work necessitate an updated Notification to the State of Michigan?

☐ Yes, Submit updated notification ☐ No, covered under annual notification

Competent Person: Printed Name _____

_____ **Phone Number:** _____
(signature)

MPC Coordinator Signature: Printed Name _____

_____ **Phone Number:** _____

SUBMIT TO VERDANT
https://marathon.verdantwebtech.com/home/locallogin

Attachment B - MRD ACM Job Documentation Needed

TO BE FILLED OUT AND SUBMITTED TO VERDANT INBOX AFTER WORK HAS BEEN COMPLETED – FILL OUT APPROPRIATE SECTION BASED ON ACTIVITY TYPE AND SUBMIT ALL REQUIRED DOCUMENTATION

ABATEMENT:

Notification Type: ☐ Annual ☐ Updated / New (if so, attach)

Disposal Site: _____

Include contact Information (address, phone #, contact name)

Clearance Testing: ☐ NEA Established (attach) ☐ Employee Exposure Documents (attach)

_____

Include contact Information (address, phone #, contact name)

Other Documents:

- ☐ ASB DOC 1 - Competent Person Responsibilities
- ☐ ASB DOC 2 - Close Proximity
- ☐ ASB DOC 3 - Training
- ☐ ASB DOC 4 - Personal Protective Equipment
- ☐ ASB DOC 5 - Daily Safety Meeting
- ☐ ASB DOC 6 - Competent Person Daily Report
- ☐ ASB DOC 7 - Regulated Area Log
- ☐ ASB DOC 8 - Fiber Count Readings
- ☐ ASB DOC 9 - Competent Person Daily Inspection
- ☐ ASB DOC 10 - Manometer Log
- ☐ ASB DOC 11 - Field Log
- ☐ ASB DOC 12 - Waste Log

Employees who worked on project:

_____

_____

BULK SAMPLING

Performed by: _____

Laboratory Utilized: _____

_____

Include contact Information (address, phone #, contact name)

☐ Analysis / Laboratory Report with description that includes:

- specific sample locations identified,
- Total quantity of material (not just sampled)
- Results

Attachment B - MRD ACM Job Documentation Needed

CLEARANCE TESTING (ONLY)

Clearance Testing: ☐ NEA Established (attach) ☐ Employee Exposure Documents (attach)

_____

_____

Include contact Information (address, phone #, contact name)

PERIODIC SURVEILLANCE:

☐ Periodic Surveillance Report
☐ Photos of ACM (if possible)

INSPECTION / SURVEY

☐ Inspection / Survey Report
☐ Any associated laboratory reports
☐ Photos of asbestos material

O&M / REPAIR / ENCAPSULATION

MRD Work Notification #: _____

☐ Any associated laboratory reports
☐ Photos of asbestos material (before and after if possible)

Other Documents:

☐ See 'Other Documents' in Abatement Section

Employees who worked on project: _____