

Authored By: Project Coordinator	Blanchard Refining Company LLC Galveston Bay Refinery Asbestos Oversight	Doc No.: RMP-REP-000015-GB Rev No: 3
Doc Custodian: Planning Supervisor		Refinery Maintenance Procedure
Approved By: Planning Supervisor		MP-STAT-0602
Date Approved: 3/28/2023		Next Review Date: 3/28/2028 Effective Date: 3/28/2023

APPROVAL PAGE:

Signature indicates that the Procedure Review process outlined in RGD-M-000009-GB Appendix A has been completed and all action items resolved.

Kenny Spriggs
Kenny Spriggs (Mar 28, 2023 17:06 CDT)

Maintenance Supervisor

Date

Frederick Kindervater
Frederick Kindervater (Mar 28, 2023 11:24 CDT)

Maintenance Superintendent

Date

Daniel Forster
Daniel Forster (Mar 28, 2023 11:15 CDT)

Project Coordinator

Date

Jay Hart
Cecil Tray Hart (Mar 28, 2023 20:00 CDT)

Industrial Hygienist

Date

Review Responsibilities: B – C – D – **E¹** – F (Shade Type of Procedure as identified in RGD-M--000009-GB Appendix A and adjust/clarify the required signatures to match)

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

TAG NAME(S) – Asbestos Homogenous Area

UNIT – Galveston Bay Refinery Unit / Complex

SERVICE –Asbestos Materials

1. SCOPE / PURPOSE

This procedure details the steps to maintain oversight of asbestos activities that include asbestos abatement work including any removal or demolition work being performed at the unit in which they have the responsibility to ensure the work is conducted in accordance with the provision of the Asbestos NESHAP and Consent Decree.

2. REQUIREMENTS

a. RISK/SAFETY

Hazard	Control Measure
Body Mechanics	Awareness of area for body positioning when reviewing conditions of insulation
Gravity, Working at heights	Proper fall protection and securing of materials when elevated to prevent falling
Noise	Proper hearing protection
Radiation / Sunlight	Proper coverage of exposed skin
Thermal / hot equipment or piping	Awareness when in close proximity to areas of inspection

b. MATERIALS

No special materials required

c. SPECIAL TOOLS

No special tools required

3. REFERENCES

- a. SM-3 Asbestos Management Policy
- b. ENV-30 Asbestos Disposal Policy
- c. Asbestos Compliance Information Management System (ACIMS) Unit Homogeneous Area Listing
- d. Annual asbestos O & M notifications.
- e. OSHA/ EPA/ NESHAP/ TDSHS Regulations

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

4. SKILLS/TRAINING/TIME

- a. Asbestos Contractor/ Supervisor Accreditation for 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.
- b. Asbestos Building Inspector Accreditation for 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.
- c. Initial 40-hour Training for Asbestos contractor/supervisor and yearly 8-hour refresher after 1st year by EPA/TDSHS certified trainer
- d. Initial 24-hour Training for Asbestos contractor/supervisor and yearly 4-hour refresher after 1st year by EPA/TDSHS certified trainer
- e. Duration of Activity variable based on amount and location of each Homogenous Area from 10 minutes to 1 hour per assessment

5. Departures

The Asbestos Compliance Manager must approve all departures from this procedure. On the reverse side of the document, list the step number, reason for the departure and any recommendations regarding the need for procedure revision. The Supervisor will initial the departure written on the reverse side of the document.

8. PREREQUISITES

The following procedures and activities are to be completed before this procedure is performed. Verify and sign off each item.

Step	Description of Task	Initials
6.1	Confirmation of Asbestos work being performed in their unit by schedule or Work Order process.	

7. TASKS

The key steps below are sequenced to ensure safety of site personnel, environmental compliance, and prevent equipment damage. The Accredited Asbestos Supervisor/Inspector performing each step shall enter their initials in the appropriate space before going on to the next task. This is done to verify the completion of each step.

Step	Description of Task	Initials
7.1	Ensure a permit has been issued for Asbestos Work Activity.	
7.2	Ensure proper accredited Asbestos Competent Person and asbestos work personnel are performing the asbestos work (Approved Asbestos Contractor/ 3rd Party for air monitoring).	
7.3	Ensure proper notifications to regulatory (TDSHS) are in place.	

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

Step	Description of Task	Initials
7.4	Perform Managerial Oversight of Asbestos work by random checks during the asbestos activities being performed in their unit of accountabilities or ensure designated “support” to the unit Designated Asbestos Supervisor are being followed.	
	Note: Use Attachment B, Asbestos Oversight Checklist for guidance. Ensure On-Site Records/ Documents, Abatement Practices and Procedures and Waste Disposal procedures are being followed and documented.	
	Note: The Designated Asbestos Unit Maintenance Supervisor will immediately take all necessary actions to correct any violations of the Asbestos NESHAP that are discovered. If an immediate remedy is not possible, the Designated Unit Maintenance Supervisor shall stop all asbestos work until violations are reported to Asbestos Compliance Manager and corrections are made.	
7.5	Perform final inspection in the ACM-free Attachment A , Asbestos Final Inspection Report at end of activities involving asbestos.	

End of Procedure

8. REQUIRED DOCUMENTATION

- a. Attachment A – Asbestos Final Inspection Report
- b. Attachment B – Asbestos Oversight Checklist
- c. TDSHS / NESHAP Notification

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

9. SIGNOFF SECTION

UNIT:

SAP Order #:

This procedure was completed:

	_____ Date	_____ Time
Completed by:	_____	_____
Asbestos Competent Supervisor		
_____	_____	_____
Reviewed by:	_____	_____
Designated Asbestos Unit Maintenance Supervisor		

Procedure Status:

- ☐ No change/revision required
- ☐ Update to grammar/spelling, font, format
- ☐ Update needed to technical details
- ☐ Major Change needed on Document

Document the results of the procedure. Clarify any comments or deficiencies identified during use of the procedure.

If any updates to procedure are needed, fill out an Information Management Service Request and attach scanned copy of procedure. On the request site, select "DC E/W" tab (Document Control E/W) then "new item" to enter the request.

<https://mympc.sharepoint.com/sites/mpc-GBR-ENG/SitePages/serviceRequests.aspx>

**All executed procedures must be reviewed, signed, and filed by the
Designated Asbestos Unit Maintenance Supervisor**

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

10. REVISION HISTORY

Rev	Date	By	Description
0	8/12/11		Took out references to specific contractors and made references generic.
1	12/02/14		Issue in OpenText
2	3/09/2023		Changed TCR to Galveston Bay Refinery, updated procedure review team & review dates, and made grammatical updates.
3	3/28/2023		Reformat MP-STAT-0602 per New MP Policy RGD-M-000009-GB and Complete 5 Year Review and updated hyperlink

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

11. ATTACHMENT A

ASBESTOS FINAL INSPECTION REPORT

ACIMS Project No:	Date:	Unit:
SAP Order #:	DCN:	
Client: Galveston Bay Refinery	Competent Person's (CP) Name:	
Contractor:	Project Name:	

I. 1 st VISUAL INSPECTION	YES	NO	*N/A
All containment barriers remain in place?	☐	☐	☐
All other warnings remain in place?	☐	☐	☐
All permits in place?	☐	☐	☐
Everything in work area has been cleaned?	☐	☐	☐
All tools and equipment removed from work area and decontaminated?	☐	☐	☐
Decontamination chamber(s) attached to the containment clean and intact?	☐	☐	☐
Have poly walls and floors been damp wiped and HEPA Vacuumed?	☐	☐	☐
<i>if NO to any of the above questions, area must be cleaned in order to proceed with spraying the lockdown encapsulant or running clearance samples</i>			
Loose debris observed in work area?	☐	☐	☐
Loose debris or residue in or around the containment?	☐	☐	☐
Loose debris or residue in or around where bags of ACM waste were stored?	☐	☐	☐
Loose debris or residue in or around the bag-out room?	☐	☐	☐
ANY residue left on anything within the work area?	☐	☐	☐
<i>if YES to any of the above questions, area must be cleaned in order to proceed with spraying the lockdown encapsulant or running clearance samples</i>			
All remaining exposed areas of asbestos encapsulated properly?	☐	☐	☐
General assessment of work area & type of work being performed:			

II. CONSENT TO PROCEED WITH ENCAPSULATION

By signing below, I verify that I performed a visual inspection inside the work area (referenced above) and there is no visible debris and / or residual asbestos containing material remaining on the equipment / lines or on the poly surfaces within or around the work area as specified in 40 CFR 763 Subpart E. I also verify that I fully understand every question above and answered it honestly and to the best of my abilities.

Signature of 3rd Party CP

Representative:

PRINT NAME	SIGNATURE
------------	-----------

Signature of 1st Contractor CP

Representative:

PRINT NAME	SIGNATURE
------------	-----------

Signature of 2nd Contractor CP

Representative:

PRINT NAME	SIGNATURE
------------	-----------

If three signatures are filled in the designated spaces above, the lockdown encapsulant can be applied inside the containment (referenced above). Once the lockdown is dry, clearance air sampling can be collected.

CONTINUED ON NEXT PAGE

Blanchard Refining Company LLC	Galveston Bay Refinery	
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3

III. CLEARANCE AIR SAMPLING

Are the clearance air monitoring sample analysis below the 0.01 fibers per cubic centimeter (0.01 f/cc) of air, as referenced in EPA 40 CFR 763 (AHERA protocol)

YES☐**NO**☐***N/A**☐

if NO, containment can NOT be deconstructed, containment must be cleaned again, and additional clearance air sampling must take place.

IV. 2nd VISUAL INSPECTION**YES**☐**NO**☐***N/A**☐

Containment completely deconstructed?

All material that constructed the containment was properly labeled and disposed of as asbestos containing material?

Area still properly barricaded and all warning signs still in place?

No loose debris observed within proximity of the work area?

if YES to all of the above questions, the inspection may proceed to section V.

V. FINAL SIGN OFF

By signing below, I verify that I performed a final visual inspection after the containment, glove bag, etc. (referenced above) was deconstructed and there is no visible debris and / or residual asbestos containing material remaining on the equipment / lines or within proximity of the work area. I also verify that I fully understand every question above and answered it honestly and to the best of my abilities.

Signature of 3rd Party CP

Representative:

PRINT NAME: _____

SIGNATURE: _____

DATE: _____

Signature of Contractor CP

Representative:

PRINT NAME: _____

SIGNATURE: _____

DATE: _____

Signature of MPC CP Representative:

PRINT NAME: _____

SIGNATURE: _____

DATE: _____

Blanchard Refining Company LLC	Galveston Bay Refinery		
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3	

12. ATTACHMENT B

ASBESTOS OVERSIGHT CHECKLIST

Project: _____

Date: _____

On-Site Records/Documents:		YES	NO	UNK	N/A
1	PLM Bulk Sample Analytical Results				
2	Roster of on-site abatement workers				
3	Worker's annual physicals 1926.1101 (M)				
4	Worker's fit test records 1910.134				
5	Daily sign-in/sign-out sheets				
6	Daily field reports (logs)				
7	Copy of contract specifications/Design/SOP				
8	Project/Ambient air monitoring				
9	Personnel air monitoring results posted onsite				
10	Evidence of NESHAP training 61.145(c)(8)				

Asbestos Practices and Procedures:		YES	NO	UNK	N/A
11	Notification submitted 61.145(b)				
12	Activities according to notification 61.145(b)(2)				
13	Project began on notification start date 61.145(b)(3)				
14	Are wet methods being used 61.1459(c)				
15	ACM thoroughly wet 61.145(c)(2), (3) & (4)				
16	Units carefully lowered 61.145(c)(2)				
17	HEPA ventilation was used 61.145 (c)				
18	Negative air pressure enclosure being used 1926.1101(g)(5)(i)				
19	HEPA vacuum available 1926.1101(g)(1)(i)				
20	Component(s) sealed 61.145(c)				

CONTINUED ON NEXT PAGE

Blanchard Refining Company LLC	Galveston Bay Refinery		
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3	

Asbestos Practices and Procedures:		YES	NO	UNK	N/A
21	Sealed components(s) labeled 61.150(a)				
22	Are "warning signs" posted 1926.1101 (k)(7)(ii)(A)				
23	Is regulated area established 1926.1101(e)				
24	Is the containment sealed				
25	Is there a "three stage" decontamination unit 1926.1101(j)(1)(i)				
26	Is the "three stage" decontamination system functional w/a shower 1926.1101(j)(1)(i)(B)				
27	Is the "three-stage" decontamination unit system being properly utilized 1926.1101(j)(1)(ii), 926.1101(j)(1)(iii)				
28	Is supervisor/OSHA Competent Person present 61.145(c)(8)				
29	Are workers properly using personal protective equipment while performing work				

Asbestos Practices and Procedures:		YES	NO	UNK	N/A
30	Project /Ambient air monitoring				
31	Personnel air monitoring 1926.1101(f), 1926.1101 App A				
32	Air sampling pump & calibration tools onsite (Inc. Condition)				
33	Personnel air monitoring (25% Each Work Task) 1926.1101(f), Additional Clarifications				

Waste Disposal Procedures:		YES	NO	UNK	N/A
34	Visual emissions 61.150(a)				
35	Is bag out area chambered				
36	Is ACWM double bagged 1926.1101(g)(5)(iv)(A)(7)				
37	Are bags wet wiped/HEPA vacuumed				
38	Is ACWM in bags thoroughly wet 61.150(a)(1)(iii)				

CONTINUED ON NEXT PAGE

Blanchard Refining Company LLC	Galveston Bay Refinery		
Title: Asbestos Oversight	Doc Number: RMP-REP-000015-GB	Rev No: 3	

39	Do bags have OSHA warning labels 61.150(a)(1)(iv)				
40	Do bags have generator labels 61.150(a)(1)(v)				

Waste Disposal Procedures:		YES	NO	UNK	N/A
41	Is waste container lined				
42	Are bags in waste container clean (Debris)				
43	Do bags have generator labels 61.150(a)(1)(w)				
44	Is the waste transporting vehicle marked during loading and/or unloading? 61.150(c)				
45	Is ACWM to be disposed of at an approved site 61.150(b)				

OSHA Asbestos Competent Person Signature: _____

Comments: _____
