

Doc Custodian: Safety Professional	<b>Marathon Petroleum Company LP Refining</b>	Doc No: RSW-0144-GV Rev No: 7
Approved By: Safety Supervisor		<b>Garyville Refining Safe Practice</b>
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## 1.0 PURPOSE

- 1.1 The purpose of this program is to inform MPC LRD and Contractor employees of the criteria used to develop safe work practices necessary to minimize exposure to asbestos and outline procedures followed to anticipate the potential for hazardous exposures, control exposures and verify the effectiveness of control measures.

## 2.0 APPLICATION

- 2.1 This program applies to all Marathon Petroleum Company LP (MPC), Louisiana Refining Division (LRD) and Contractor personnel who may disturb asbestos-containing materials (ACMs) or presumed asbestos-containing materials (PACMs) during activities such as demolition or equipment maintenance.

## 3.0 IMPLEMENTATION

- 3.1 The implementation of the requirements outlined in the Asbestos Exposure Control Program shall be adhered to on this standard's effective date.

## 4.0 RESPONSIBILITIES

- 4.1 The Division's Safety Supervisor is designated as the administrator of this program and is responsible for its implementation at the Louisiana Refining Division.
- 4.2 The Safety Department will:
- 4.2.1 Periodically inspect the integrity of existing asbestos to ensure it is in good condition and take corrective actions if found otherwise.
- 4.2.2 Periodically review this Program.

## 5.0 DEFINITIONS

- 5.1 **Amended water:** water to which surfactant (wetting agent) has been added to increase the ability of the liquid to penetrate ACM and suppress fiber release during removal.
- 5.2 **Asbestos:** chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos and actinolite asbestos. For purposes of this program, "asbestos" includes PACM as defined below.
- 5.3 **Asbestos Abatement Contractor:** a company licensed by the State of Louisiana as an Asbestos Abatement Contractor that employs Louisiana Department of Environmental Quality (LDEQ) certified Asbestos Abatement Workers and Contractor/Supervisors.
- 5.4 **Asbestos Abatement Contractor Supervisor:** a person who has successfully completed an accredited training course and is certified by the LDEQ to supervise the work of Asbestos Abatement Workers. The Asbestos Abatement Contractor/Supervisor is considered to be the Asbestos Abatement Contractor's Competent Person.
- 5.5 **Asbestos-containing Material (ACM):** any material containing more than one percent asbestos.
- 5.6 **Asbestos Disposal Verification Form (ADVF):** a waste shipment record document required to be originated and signed by the waste generator or the owner or operator of a demolition or renovation activity, used to track and substantiate the disposition of asbestos-containing waste material. Each notification received by the LDEQ that is associated with a project that generates

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asbestos-containing waste material shall result in a confirmation letter with a specific project number to the owner or operator accompanied by an ADVF with a specific facility code.

- 5.7 **Asbestos Inspector:** a person who has successfully completed an accredited training course and is certified by the LDEQ to inspect and sample friable asbestos containing materials.
- 5.8 **Asbestos Abatement Worker:** a person who has successfully completed an accredited training course and is certified by the LDEQ to remove and repair friable asbestos containing materials.
- 5.9 **Authorized Person:** any person authorized by the licensed Asbestos Abatement Contractor and the LRD and required by work duties to be present in regulated areas.
- 5.10 **Class I Asbestos work:** activities involving the removal of thermal system insulation (TSI) or surfacing ACM or PACM.
- 5.11 **Class II Asbestos work:** activities involving the removal of ACM that is neither TSI or surfacing ACM. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
- 5.12 **Class III Asbestos work:** repair and maintenance operations, where TSI and surfacing ACM or PACM, is likely to be disturbed.
- 5.13 **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, and III activities.
- 5.14 **Clean Room:** an uncontaminated room having facilities for the storage of employees' street clothes and uncontaminated materials and equipment.
- 5.15 **Competent Person:** a MPC and/or Asbestos Abatement Contractor employee who is capable of identifying existing asbestos hazards in the work place and selecting the appropriate asbestos exposure control strategy. These persons include the LRD industrial hygienist or Asbestos Abatement Contractor employee who has received appropriate training and possesses current LDEQ Asbestos Abatement Contractor/Supervisor certification.
- 5.16 **Covered Employee:** an employee performing regular or periodic work operations that involve asbestos exposure where industrial hygiene monitoring confirms results above OSHA regulatory limits. This includes an employee assigned to an asbestos insulation removal task where exposure could exceed 0.1 fiber per cubic centimeter.
- 5.17 **Critical Barrier:** one or more layers of plastic sealed over all openings into a work area or any other physical barrier sufficient to prevent airborne asbestos in a work area from migrating to an adjacent area.
- 5.18 **Decontamination Area:** an enclosed area adjacent and connected to the regulated area, consisting of an equipment room, shower area, and clean room, that is used for decontamination of workers, materials, and equipment that are contaminated with asbestos.
- 5.19 **Encapsulating Materials:** adhesives applied to the surface of ACM that reduce the release of asbestos fibers during disturbance of the material.
- 5.20 **Friable ACM:** ACM that can be pulverized and reduced to dust by hand pressure.

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- 5.21 **Glovebag:** single use 60 X 60 inch impervious plastic bag-like enclosure affixed around ACM, with glove like appendages through which material and tools may be handled.
- 5.22 **Non-Friable Material:** under the EPA Asbestos NESHAP, non-friable materials are divided into two categories:
  - 5.22.1 Category I - Asbestos containing resilient floor coverings (also known as VAT or Vinyl Asbestos Tile), asphalt roofing products, packing and gaskets.
  - 5.22.2 Category II – All Others.
- 5.23 **Presumed Asbestos Containing Material (PACM):** thermal system insulation and surfacing material found in buildings and vessels constructed prior to 1980.
- 5.24 **Regulated Area:** an area established by the Asbestos Abatement Contractor or the LRD Safety Department employer to demarcate areas where the disturbance of ACM or PACM and/or the handling/containerization of waste generated by such work will occur.
- 5.25 **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).
- 5.26 **Surfacing ACM:** surfacing material that contains more than 1% asbestos.
- 5.27 **Thermal System Insulation:** ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain which contains more than 1% asbestos.
- 5.28 **Permissible Exposure Limit (PEL):** the OSHA PEL for airborne asbestos is 0.1 fibers per cubic centimeter (0.1 f/cc) of air expressed as an 8-hour time-weighted average (TWA) determined using the NIOSH Sampling and Analytical Method 7400.
- 5.29 **Excursion Limit:** the OSHA excursion limit is 1.0 fiber per cubic centimeter of air averaged over a 30 minute sampling period.

## 6.0 REQUIREMENTS

- 6.1 The LRD will use only non-asbestos materials for new installations or to replace existing asbestos-containing materials, when technically feasible. All unused asbestos materials in storage must not be used and must be disposed of properly.
- 6.2 Asbestos Survey and Identification
  - 6.2.1 Identified ACM and PACM at LRD
    - 6.2.1.1 The LRD has conducted surveys of building and insulating materials throughout the refinery to identify asbestos-containing materials.
    - 6.2.1.2 Asbestos free insulation that is newly installed is designated with blue colored bands to indicate “Asbestos Free”.
    - 6.2.1.3 Asbestos-containing materials identified at the LRD include:
      - 6.2.1.3.1 Corrugated panels on certain cooling towers and barriers around fire water pumps on docks 1 and 2.

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6.2.1.3.2 Certain counter tops in the older sections of the laboratory.

6.2.1.3.3 Floor tile adhesive used in certain areas of the refinery.

6.2.1.3.4 Tar paper type covering on some underground pipe.

6.2.1.3.5 Some older flange gaskets.

6.2.1.3.6 Some fixed insulation on equipment, excluding removable insulation pads.

6.2.1.3.6.1 Prior to disturbing insulation on piping and fittings, (tee, 45°, 4-way) in Units 10, 11, 12, 14, 15, 20, 34, 36, 39, 41, and 63 pipe rack contact the LRD Industrial Hygienist or Environmental Technician to collect samples to make a determination of asbestos containing materials.

6.2.1.4 Built-up roofing materials should be presumed to be ACM (PACM) until material analysis is conducted that proves otherwise.

6.2.1.5 Refer to RSW-A-057-GV, LRD Asbestos Guide, and RSW-A-058-GV, Overall Asbestos Study Location Map, for more details.

6.2.1.6 Contact the LRD Safety Department with specific questions about materials of concern.

## 6.2.2 Classification and Potential Hazard of ACM

6.2.2.1 All types of ACM and PACM noted in section 6.2.1 are non-friable materials that do not release a significant amount of asbestos fibers to the surrounding atmosphere unless they are saw cut, pulverized or abraded.

6.2.2.2 Conspicuous labels that indicate potential hazards have been placed on ACMs (e.g. corrugated panels, lab counter tops, and some flange gaskets) that are routinely accessible.

## 6.3 Employee Exposure Monitoring

6.3.1 Evaluations of potential exposures will be conducted quantitatively and analyzed to ensure statistical validity per the Marathon Exposure Assessment Methodology (EXAM) as described in the LRD Industrial Hygiene Standard Practice.

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

6.3.3 Construction related exposure monitoring will consist of one or more samples representing full shift exposure of 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 that are most likely to exceed the PEL.

6.3.4 Initial Exposure Monitoring

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6.3.4.1 An initial exposure assessment will be conducted at the onset of any operation that involves the disturbance of ACM or PACM.

6.3.4.2 The initial assessment will be used to quantify airborne asbestos fiber concentrations in the breathing zones of personnel performing the work, in the work area atmosphere and adjacent to the work areas to assess the adequacy of the exposure control measures being employed.

6.3.4.3 The initial assessment will be conducted by the the Asbestos Abatement Contractor that will be conducting the work involving the disturbance of ACM or PACM.

6.3.4.4 The Asbestos Abatement Contractor will conduct the initial assessment in accordance with the following procedures:

6.3.4.4.1 Collect breathing zone and work area perimeter (downwind) samples in accordance with the NIOSH Sampling and Analytical Method 7400.

6.3.4.4.2 Send samples to an accredited AIHA laboratory for analysis by Phase Contrast Microscopy (PCM), in accordance with the NIOSH Sampling and Analytical Method 7400.

6.3.4.4.3 Calculate airborne fiber concentrations and report results to the LRD Industrial Hygienist as soon as possible.

#### 6.3.5 Follow-up Exposure Monitoring

6.3.5.1 If the initial exposure assessment has indicated that an airborne fiber concentration has been detected in the breathing zone, the work area atmosphere or an adjacent work area that exceeds 50% of the PEL (0.05 f/cc), additional exposure monitoring will be conducted.

6.3.5.2 In the event of follow-up exposure monitoring, sample media previously analyzed by PCM will be analyzed by Transmission Electron Microscopy (TEM) to confirm that airborne fibers detected by PCM analysis were asbestos.

6.3.5.3 It will be necessary to evaluate the adequacy of the exposure control measures and modifications made since the determination of the initial assessment results.

### 6.4 Identification and Removal of ACM

#### 6.4.1 Determination of the Asbestos Content of a PACM

6.4.1.1 Collection of samples for determination of asbestos content in a material can only be done by a LDEQ Certified Inspector.

6.4.1.2 Initiate coordination of the sampling and analysis necessary to make this determination by contacting the Safety Department, Turnaround Planning or the Maintenance Planner in a Zone Shop.

6.4.1.3 Bulk sampling and Laboratory analysis will be conducted using the following methods:

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6.4.1.3.1 Samples will be obtained from representative areas of a suspect material per OSHA Class III Work. This includes the following:

6.4.1.3.1.1 Wear a half-face respirator with P100 filter (Negative Exposure Assessment – NEA, does not exist for this task due to the variability of material types and environments performed in).

6.4.1.3.1.2 Disposable coveralls are worn if potential for friable material types to be disturbed.

6.4.1.3.1.3 Utilize wet methods.

6.4.1.3.1.4 Impermeable drop-cloth or equivalent barrier commensurate with the task shall be utilized when collecting potentially friable material.

6.4.1.3.1.5 Each sample must be sealed in a labeled plastic bag or other container that prevents the sample from releasing fibers.

6.4.1.3.2 Analyses for asbestos content shall be conducted by a qualified National Voluntary Laboratory Accreditation Program (NVLAP) and/or American Industrial Hygiene Association (AIHA) accredited laboratory using Polarized Light Microscopy (PLM).

#### 6.4.2 LDEQ Notification Requirements

6.4.2.1 The LRD Environmental Department must submit a completed **Asbestos Notification of Demolition and Renovation Form AAC-2** to the LDEQ in order to obtain an **Asbestos Disposal Verification Form(s) (ADVFs)**, for the work to be performed.

6.4.2.2 An ADVF must be received before ACM or PACM can be disturbed.

6.4.2.3 The Asbestos Notification of Demolition and Renovation Form AAC-2 must be submitted to the LDEQ at least 10 working days prior to disturbance/removal of ACM.

#### 6.4.3 Removal of ACM or PACM

##### 6.4.3.1 Required Qualifications

6.4.3.1.1 No MPC LRD personnel have been trained or received certification required to conduct work involving the removal of ACM. Therefore, these personnel will not be directly involved in the removal or disturbance of ACM or PACM.

6.4.3.1.2 Asbestos Abatement Contractors hired by MPC, LRD, to perform maintenance/demolition work that could disturb an asbestos-containing material will be required to submit their “**Asbestos Exposure Control/Abatement Program**” (including project specific plans) for review and approval by the LRD Environmental and Safety Department prior to beginning work. The Asbestos Abatement Contractor’s Program and project specific plans must comply with all

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requirements contained in the LRD Safe Practices and Procedures Manual and the following state and federal regulations:

6.4.3.1.2.1 OSHA 29 CFR 1910.1001 – General Industry, Asbestos

6.4.3.1.2.2 OSHA 29 CFR 1926.1101 – Construction, Asbestos

6.4.3.1.2.3 EPA 40 CFR 61 – National Emissions Standard for Hazardous Air Pollutants (NESHAPS).

6.4.3.1.2.4 LAC 33:III.51 – Louisiana DEQ Comprehensive Toxic Air Pollutant Emission Control Program.

6.4.3.1.3 The Asbestos Abatement Contractor shall also be required to meet the following guidelines:

6.4.3.1.3.1 Be licensed by the State of Louisiana to conduct asbestos abatement;

6.4.3.1.3.2 Supervise asbestos abatement project(s) with LDEQ Asbestos Abatement Contractor/Supervisor certified personnel; and

6.4.3.1.3.3 Use only LDEQ certified Asbestos Abatement Workers to perform asbestos abatement.

6.4.3.2 Removal procedures for ACM and PACM that may become friable during removal

6.4.3.2.1 Containment systems equipped with HEPA filtered ventilation must be used for the removal of ACM or PACM that may become friable during the course of removal.

6.4.3.2.2 All containment systems constructed for this purpose must be approved by the LRD Industrial Hygienist before disturbance of ACM or PACM can commence.

6.4.3.2.3 The type and size of containment system and HEPA filtered ventilation equipment required to prevent the release of asbestos fibers to the surrounding work area atmosphere depends on the surface area of the material to be disturbed or removed.

6.4.3.2.4 Smaller work surface areas (e.g. drilling or cutting lab counters or cooling tower panels) can be contained inside a glovebag. HEPA filtered vacuums will be used to collect fibers released during material disturbance or removal.

6.4.3.2.5 Larger work surface areas (e.g. removal of gasket material internal to preheater) will require a containment that consists of 6 mil polyethylene sheet walls, ceiling and floor (critical barriers) and a HEPA filtered ventilation system that can maintain a negative pressure differential of 0.01 inches of water between the interior and exterior of the containment. Considerations for specifying and selecting containment systems should include the following:



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6.4.3.2.5.1 Load bearing capacity and integrity of the containment system and of the scaffolding structure.

6.4.3.2.5.2 Size and elevation of the equipment being abated.

6.4.3.2.5.3 Location of the structure or equipment.

6.4.3.2.5.4 Proximity to other buildings, structures or equipment.

6.4.3.2.5.5 Local climate and conditions (e.g., heavy winds, rain, etc.).

6.4.3.2.6 Poorly ventilated containment systems can lead to increased airborne asbestos concentrations inside the containment. They must be designed to optimize the flow of ventilation air past the worker.

6.4.3.2.7 Amended water and/or encapsulating materials must be applied to all exposed surfaces of ACM or PACM that may become friable during the course of disturbance or removal operations. This application is necessary to suppress the release of asbestos fibers during the operation.

6.4.3.2.8 Containerization of friable ACM or PACM must be performed as the material is removed from the supporting substrate. Friable ACM or PACM is to be placed in disposal containers (bags or lined drums) that are labeled for transport and disposal in accordance with state and federal regulatory requirements.

#### 6.4.3.3 Removal Procedures for Non-Friable ACM and PACM

6.4.3.3.1 Procedures to be employed by an approved Asbestos Abatement Contractor to remove ACM or PACM must be approved by the LRD Safety Department before removal of the material can commence.

6.4.3.3.2 Built-up roofing material must be removed in an intact state and using wet methods. Cutting machines can be used if equipped with HEPA filtered collection systems and the cut area is continuously misted with amended water. Wetted roofing materials shall be containerized by wrapping in 2 layers of 6 mil polyethylene sheeting sealed with duct tape. Smaller pieces of roofing material can be placed in pre labeled disposal containers (bags or lined drums) prior to being lowered to ground level. All wrapped sections of roofing must be labeled for transport and disposal in accordance with state and federal regulatory requirements prior to being lowered to ground level. The roof level HVAC air intake sources will be isolated or the ventilation system will be shut down while removal is in progress.

6.4.3.3.3 Corrugated Cementitious ACM Panels (Transite) must be removed from supporting structures by disabling mechanical fasteners. Cutting or intentional breaking of panels is prohibited. Each panel shall be sprayed with amended water prior to and during removal of fasteners. Panels removed from an elevated structure must be placed in a padded transfer container and lowered to ground level. Wetted panels must be wrapped in 2 layers of 6 mil polyethylene sheeting sealed with duct tape as soon as they are lowered to ground level. Any small pieces that break from panels (on elevated structure or at ground

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level) must be immediately placed in pre labeled disposal containers (bags or lined drums). All containers and wrapped panels must be labeled for transport and disposed in accordance with state and federal regulatory requirements.

6.4.3.3.4 The majority of pipe flange gaskets and gasket material at heater and vessel man-ways that could have once been an ACM have been replaced with non-ACM gaskets. Pipe gasket material that is not of the spiral wound type consisting of stainless steel foil and graphite should be considered PACM. Gasket material considered to be PACM must be removed by certified Asbestos Abatement Contractor personnel. Appropriate handling of a gasket material considered to be PACM must be initiated by contacting the Safety Department or the Zone Shop Planner. Gaskets that are visibly deteriorated and unlikely to stay intact when removed should be removed within a glove bag. The gasket must be thoroughly wetted with amended water and immediately placed in an appropriately labeled transport/disposal container. Any scraping to remove residue will be done wet.

6.4.3.3.5 In most instances new flooring will be installed over existing flooring to avoid the disturbance of adhesives that have been determined to be ACM. In the event that existing flooring must be removed, the Asbestos Abatement Contractor's plan for removal of the flooring and adhesive must be reviewed and approved by the LRD Safety Department before work can commence. The necessity to perform this work in a contained work area equipped with a HEPA filtered ventilation system will depend on the proposed method of removal.

#### 6.4.3.4 Personal Protective Equipment

6.4.3.4.1 The following Personal Protective Equipment (PPE) must be worn by Asbestos Abatement Workers and Asbestos Abatement Supervisors directly involved in the disturbance/removal of ACM or PACM and any MPC personnel who enter a regulated work area perimeter barricade tape:

6.4.3.4.1.1 Half face P100 filter respirator (Assigned Protection Factor or APF = 10)

6.4.3.4.1.2 Full body disposable coveralls (Tyvek)

6.4.3.4.1.3 Disposable gloves

6.4.3.4.2 All protective coveralls must be removed and placed in labeled disposal bags prior to leaving the work area perimeter. Gloves must be removed and placed in labeled disposal bags prior to leaving the work area perimeter or remain in the work area for reuse by the same worker until completion of the project. Respirators are to be removed from the work area, washed, and inspected each time the worker leaves the work area perimeter. Respirator filters must be removed and placed in labeled disposal bags at the end of each shift.

#### 6.4.3.5 Work Area Demarcation

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- 6.4.3.5.1 ACM and PACM disturbance/removal regulated work areas must be isolated using asbestos barrier tape (20' radius from area of disturbance/removal) and warning signs placed at all perimeters, outside the taped area, which read:

**DANGER  
ASBESTOS  
MAY CAUSE CANCER  
CAUSES DAMAGE TO LUNGS  
AUTHORIZED PERSONNEL ONLY**

- 6.4.3.5.2 Prohibited activities in the regulated area include chewing gum or tobacco, eating, drinking, and smoking.

#### 6.4.3.6 Decontamination Areas/Personal Hygiene Facilities

- 6.4.3.6.1 In the event that the removal of a large surface area (greater than 10 square feet) of non-friable ACM will render it friable, a large work area containment system must be constructed. If personnel are required to enter a contained regulated work area to remove friable ACM, the Asbestos Abatement Contractor must construct or install a self-contained decontamination area / trailer consisting of equipment room, shower and clean room in accordance with 29 CFR 1926.1101 (j).
- 6.4.3.6.2 Personal hygiene facilities shall be erected adjacent to the perimeter of work areas where the removal of large surface areas of non-friable materials (e.g. cooling tower panels) is to be conducted.
- 6.4.3.6.3 At a minimum, these personal hygiene facilities will consist of a portable hand washing station and disposal containers for used disposable coveralls and respirator filters.
- 6.4.3.6.4 Placement of personal decontamination facilities shall be approved by LRD Safety, Operations and Maintenance Departments.

#### 6.4.3.7 Housekeeping

- 6.4.3.7.1 All regulated work area surfaces must be maintained as free as practical of accumulations of ACM or PACM debris. At no time shall any ACM or PACM debris, that is not containerized, be visible in a work area that is not occupied by Asbestos Abatement Workers and/or being monitored by a competent person. Methods of debris removal and containerization shall be as follows:
- 6.4.3.7.1.1 Amended water shall be used to control employee exposures during ACM or PACM handling, removal, cutting, and cleanup.
- 6.4.3.7.1.2 ACM or PACM debris and related waste shall be wetted down with amended water prior to collection and containerization.

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6.4.3.7.1.3 Wet materials shall be placed in labeled 6 mil polyethylene disposal bags. Each bag must be evacuated with a HEPA filtered vacuum and sealed with duct tape. The bag will then be placed in another labeled 6 mil polyethylene disposal bag and duct tape closed.

6.4.3.7.1.4 All bagged ACM and PACM must be placed in designated asbestos disposal/transport containers prior to the end of shift.

6.4.3.7.2 Vacuums must be equipped with high-efficiency particulate air filters (HEPA) and used and emptied in a manner that minimizes the re-entry of asbestos into the workplace atmosphere.

6.4.3.7.3 ACM or PACM work areas must not be cleaned with compressed air or brooms.

#### 6.4.4 Disposal of ACM

6.4.4.1 Covered and labeled transport/disposal containers to be used solely for ACM that is bagged or wrapped shall be provided at the job site. No other materials may be placed in these containers. Lids of containers must be kept closed.

6.4.4.2 Double bagged or double wrapped ACM must have visible water inside. All bagged or wrapped ACM must have ownership identification labels affixed to the outside of each individual bag or wrapped section.

6.4.4.3 All contaminated protective clothing and potentially contaminated materials (e.g. containment sheeting, duct tape, etc.) shall be placed in labeled 6 mil polyethylene disposal bags when removed and double bagged in another labeled 6 mil disposal bag. The initial bag of ACM waste will be HEPA vacuumed before it is double bagged and sealed.

6.4.4.4 Containers and bags must be marked clearly as follows:

6.4.4.4.1 First Label:

**Danger**  
**Contains Asbestos Fibers**  
**May Cause Cancer**  
**Causes Damage to Lungs**  
**Do Not Breathe Dust**  
**Avoid Creating Dust**

Second Label:

**Caution**  
**Contains Asbestos Fibers**  
**Avoid Opening or Breaking Container**  
**Breathing Asbestos is Hazardous to Your Health**

6.4.4.4.2 Third Label:

Asbestos  
NA 2212  
RQ

(This label must be in an orange

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rectangular or white square on point display on all four sides of the container.)

6.4.4.4.3 Fourth Label: Name and Location of Waste Generator

6.4.4.5 Bags and wrapped ACM must be transported directly from regulated work areas to disposal containers. All temporary ACM waste storage areas must clearly display the following sign:

Danger  
Asbestos Materials  
Storage Area  
(2" or 3" high yellow letters/red background or 1" or 2" red letters/yellow background)

6.4.4.6 Disposal of containerized ACM shall be in accordance with all applicable state and federal environmental regulations.

6.4.4.7 The LRD Environmental Department must obtain an Asbestos Disposal Verification Form(s) (ADVFs) from the LDEQ, for the work to be performed. An ADVF must be received before ACM or PACM can be disturbed. The Asbestos Notification of Demolition and Renovation Form AAC-2 must be submitted to the LDEQ at least 10 working days prior to disturbance/removal of ACM.

6.4.4.8 The Environmental and Safety Department will be responsible for selection of the disposal facility and coordination of all asbestos disposal activities.

## 6.5 Medical Surveillance

6.5.1 Asbestos Abatement personnel who are engaged in Class I, II, or III work for a combined total of 30 or more days per year must be covered by their employers' medical surveillance program. Employers must ensure that the program provides covered employees with medical evaluations in accordance with 29 CFR 1926.1101 (m).

6.5.2 Only Asbestos Abatement Contractor personnel, not MPC employees, conduct operations that could result in the disturbance of an ACM or PACM at the LRD. Therefore, no MPC employees are considered covered employees that would require medical surveillance.

## 6.6 Recordkeeping

6.6.1 The MPC Health Services Department in Findlay, Ohio and the Louisiana Refining Division Environmental and Safety Department will establish and maintain an accurate record of all exposure monitoring, medical surveillance (if necessary for MPC employees) and other data used to conduct employee exposure assessments as required by the Asbestos in Construction Standard 29 CFR 1926.1101 and provisions in 29 CFR 1910.1020, Access to Employee Exposure and Medical Records.

6.6.2 The LRD Asbestos Abatement Contractors are also required to maintain records of all employee monitoring, medical surveillance, and other data used for exposure assessments.

## 7.0 TRAINING

7.1 Training for the Asbestos Exposure Control Program and revisions to this procedure will be provided to employees and contractors via the monthly HESS meeting.

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- 7.2 MPC employees with the potential for exposure to asbestos during their work at the LRD are required to complete awareness level computer-based training each year.
- 7.3 MPC, LRD and Asbestos Abatement Contractor employees who may be exposed to airborne asbestos concentrations in excess of the PEL shall be provided with information and training on asbestos hazards (LDEQ Asbestos Abatement Worker certification at a minimum) prior to being assigned to do work where the potential for such exposure exists. If monitoring shows exposures above the PEL, employees shall be provided with information and training at least annually thereafter.
- 7.4 LRD Asbestos Inspectors shall annually complete asbestos inspector training as required by Louisiana DEQ to maintain accreditation and licensing.
- 7.5 Custodian personnel (Housekeeping) need to complete a 2-hour initial awareness training.
- 7.6 Training will consist of, but is not limited to, the following:
- 7.6.1 The provisions of LAC 33.III, Chapter 51; EPA regulations contained in 40 CFR 61; and, OSHA regulations contained in 29 CFR 1910.1001 and 29 CFR 1926.1101.
  - 7.6.2 Hazard Communications 29 CFR 1910.1200.
  - 7.6.3 Specific nature of operations that could result in exposure to asbestos above the OSHA PEL.
  - 7.6.4 Respiratory Protection.
  - 7.6.5 Purpose and description of medical surveillance and medical removal programs.
  - 7.6.6 Engineering controls and good work practices associated with the job assignment.
  - 7.6.7 Descriptions of and hands-on training in the proper methods of handling ACM.
  - 7.6.8 Contents of any compliance plan in effect including this program.
  - 7.6.9 The right to access records under 29 CFR 1910.1020 "Access to Employee Exposure and Medical Records".
- 7.7 All materials relating to the training programs and copies of applicable OSHA standards and the Louisiana Administrative Code will be made readily available to all employees.

## 8.0 RECORDKEEPING

- 8.1 All records associated with this Standard and its implementation shall be maintained in accordance with Marathon Petroleum Corporation Enterprise Records and Information Management Policy (MPC6003).

## 9.0 REFERENCES

- 9.1 OSHA: Asbestos, 29 CFR 1910.1001
- 9.2 OSHA: Asbestos, 29 CFR 1926.1101
- 9.3 OSHA: Access to Employee Exposure and Medical Records, 29 CFR 1910.1020

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- 9.4 OSHA: Hazard Communication, 29 CFR 1910.1200
- 9.5 EPA: NESHAPS, 40 CFR Part 61, Subpart M
- 9.6 LAC: 33:III.51
- 9.7 MPC Asbestos Exposure Control Standard, HLT-2008
- 9.8 LRD Industrial Hygiene Standard Practice, RSW-0118-GV
- 9.9 RSW-A-057-GV, LRD Asbestos Guide
- 9.10 RSW-A-058-GV, Overall Asbestos Study Location Map
- 9.11 DOC. LIB. NO.: 311.44

## 10.0 APPENDICES

- 10.1 RSW-A-057-GV, LRD Asbestos Guide
- 10.2 RSW-A-058-GV, Overall Asbestos Study Location Map

## 11.0 REVISION HISTORY

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Approval	Roger Gautreau	Refining Management Team (RMT)	09/18/08	09/18/08
1	3 Year Review- minor changes at 6.1.1.3 and 6.2.3.4.2	Chuck Whitman	Safety Dept.	9/27/2011	9/27/2011
2	Added responsibility in 4.2 and EXAM process in 6.3.1	Jessica Myers	VPP Committee on 6/12/2014 RLT on 6/19/2014	6/20/2014	6/20/2014
3	Added locations of ACM under 6.2, added reference RSW-A-057-GV, added to contact Safety for materials of concern	Jessica Myers	VPP Committee 4/20/2017 RLT 6/22/2017	4/17/2017	6/23/2017
4	Added 6.1.1.6.1 with specific units having PACM in insulation and notifications to make prior to disturbance, removed Safety Department from 6.4.1.1 as personnel that can collect samples, added RSW-A-058-GV. Moc 53039	Jessica Myers	VPP Committee: 10/31/2018 RLT: 11/08/2018	10/11/2018	11/08/2018
5	Expanded 6.4.1.3.1 per Tier II Audit Finding for Bulk Sampling Practices needing clarification. Impact is only to LDEQ licensed inspectors.	Alexander Mapel	Safety	10/18/2019	10/18/2019

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Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
6	Routine triennial review, updated signage wording per OSHA standard, clarified training requirements for LRD asbestos inspectors and contract custodial workers.	Alexander Mapel	Safety	5/29/2020	5/29/2020
7	Added 63 pipe rack as additional location to sample before disturbing, changed requirement to perform initial exposure assessment from LRD Safety to Asbestos Abatement Contractor – Tier II audit rec to match current practice.	Brendan Mullins	RLT	12/9/2022	12/9/2022