



**resolute**  
Forest Products

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## **Calhoun Operations**

Title:

# **Asbestos Guidance**

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## Prerequisites:

Before starting this guidance, you should have successfully completed:

**None**

## Purpose:

In effort to protect our employees and contractors and to comply with federal, state, local and municipal regulations, Calhoun Operations has adopted this asbestos compliance program. This program addresses the following provisions regarding asbestos containing materials (ACM):

- Training on asbestos awareness and hazard communication
- Internal communication
- Work practices and controls
- Documentation procedures

## Units:

01 Definition of Terms  
02 General Asbestos Information  
03 Requirements  
04 Work Practices and Controls  
05 Training

## Unit 01

# Definition of Terms

OSHA means the Occupational Safety and Health Association that governs the issues pertaining to our mill.

ACM means Asbestos-Containing Material, which is any material containing more than 1% asbestos.

PACM means Presumed Asbestos-Containing Material, which is thermal insulation, sprayed-on or troweled-on surfacing material and debris in work areas where such material is present.

PEL means the current Permissible Exposure Limit mandated by OSHA regulations.

TWA means the current 8-hour maximum OSHA Time Weighted Average exposure limit.

The excursion limit means the current 30-minute maximum OSHA exposure limit.

O & M means the Operations & Maintenance referred to in this program.

## Unit 02

# General Asbestos Information

**You cannot look at a material and determine if it contains asbestos or is asbestos-free. An analytical test must be conducted. It is advised, unless specific Calhoun Operations' records indicate otherwise, if materials of construction were used prior to 1980, that the materials may contain asbestos.**

**If an employee or contractor disturbs ACM, or notes ACM that poses a concern of any kind, he/she should immediately contact the Asbestos Program Manager.**

### **New sources of ACM may not be brought on site!**

The Asbestos Program Manager for Calhoun Operations is the Safety Manager. The Environmental Manager may provide assistance in the absence of the Safety Manager.

The Asbestos Program Manager has the authority to oversee and to direct custodial/maintenance staff and contractors with regard to all asbestos-related activities.

Initial and ensuing building inspections performed by trained, qualified, experienced inspectors will locate and assess the condition of all ACM in the mill.

When outside contractors are used for asbestos-related activities, their references and training documentation should be thoroughly checked and their subsequent work monitored.

### **ACM Surveys:**

In 2002, a survey of the Paper Mill operations areas was conducted by S&ME.

Samples of insulation on pipes, air ducts, floor tile, paint, and siding were taken to establish the location, type, and percentage of asbestos in these areas.

The areas are identified today by a tag/label attached directly to the place in which asbestos is found.

## Unit 03

# Requirements

The EPA and OSHA have jurisdiction over asbestos (governing regulations from TDEC asbestos abatement contractor rules and EPA NESHAP [for asbestos]).

More information may be found at the EPA website.

Prior to any activity on or around known a suspected ACM, form **E200-ASB-F-0 Asbestos Containing Material (ACM) Work Authorization** must be completed by the Calhoun Operations representative, Asbestos Program Manager, and Environmental Manager. This completed form will be kept at the project site during the work activities and will be returned to the Asbestos Program Manager and a copy to the Environmental Manager with any other applicable project documents.

Removal of ACM requires a state issued license. Calhoun Operations currently does not hold a license for these activities. All ACM removal-related jobs will involve state-licensed contractors. The contractors will provide turn-key project management, including filing all proper documentation with TDEC and waste disposal manifests.

Certified/licensed contractor will:

- Notify TDEC at minimum of 10 days prior to the project following TDEC's guidelines below:
  - Persons involved with the removal of Regulated Asbestos-Containing Material (RACM) during facility renovation and/or demolition must file a notification with the Tennessee Division of Air Pollution Control (APC).
  - A notification is required for the removal, renovation and/or demolition of asbestos where quantities exceed 260 linear feet or more on pipes, 160 square feet or more on other facility components, or 35 cubic feet or more off facility components where the length or area could not be measured previously.
  - Notification to APC is required of any demolition (includes intentional burning) even if there is no asbestos.

- Exemptions include nonfriable asbestos containing materials, packings, gaskets, resilient floor covering and asphalt roofing products that when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure.
- [TDEC Asbestos Notification Form CN-1055](#)
- [TDEC Asbestos Waste Shipment Record CN-1054](#)
- Arrange proper disposal at a permitted landfill
- Obtain the waste shipment record
- Provide project completion notification to TDEC

Calhoun Operations' duty is to:

- Comply with OSHA notifications to employees
- Keep copies of required records
- Obtain copy of license from contractor before work commences

Asbestos may be disposed only in approved disposal sites/landfills. Contact the Environmental Department for assistance with approved disposal locations and paper work.

**Required Contractor Project Documents**

Before work commences, the Asbestos Abatement Contractor shall submit the following, in duplicate, to the Calhoun Operations' representative for approval:

1. Proof of insurance naming Calhoun Operations as certificate holder
2. Copy of State of Tennessee Asbestos Contractor's License
3. Copy of State of Tennessee Department of Environment and Conservation approval to perform dry removal of asbestos-containing material
4. Proof of general superintendent and worker training (up to Level 3 Abatement Worker training)
5. Medical examination report and respirator training documentation for each employee of the Abatement Contractor involved in the project

Prior to final payment, the Asbestos Abatement Contractor shall submit the following, in triplicate, to the Calhoun Operations' representative for approval:

1. Copy of notification to State of Tennessee Department of Environment and Conservation for demolition or removal
2. Copy of Waste Shipment Record, Chain of Custody Form, Landfill Receipt, and copy of Landfill Permit to accept ACM

**\* One copy of each of the documents above must be provided to the Safety & Environmental Manager. \***

**If Calhoun Operations' employees disturb asbestos:**

Calhoun Operations' employees will not be required to disturb or remove ACM. However, if this situation arises accidentally, all caution must be taken to ensure the fibers are not friable or become friable. Safely contain the area (i.e. encapsulation) and contact a license contractor.

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## Unit 03

# Work Practices and Controls

Certain work practices and controls should be followed as outlined in this section. The following control options should be evaluated when regular ACM surveillance to note, assess, and document any changes in ACM condition is deemed necessary:

- Repair
- Encapsulation
- Enclosure
- Encasement
- Removal (minor)

**A work control/permit system will be used to control activities that might disturb ACM. This system will require the person requesting work to submit an authorization form to the Asbestos Program Manager & Environmental Manager before any work commences.** The Asbestos Containing Material (ACM) Work Authorization Form, E200-ASB-F-0 is found on the Environmental Intranet site.

**Asbestos Containing Material (ACM) Work Authorization Form**

E200-ASB-F-0  
Revision No.: 0

Page 1 of 1  
Revision Date: 00/00/00

*\*Complete this form whenever there will be work around or on known Asbestos Containing Material\**

**Work Order Number:** \_\_\_\_\_

**Calhoun Contact for Project:** \_\_\_\_\_

**Authorization is given to proceed with the following work:**

\_\_\_\_\_  
\_\_\_\_\_

**Presence of Asbestos Containing Materials (ACM):**

- ACM is present, but its disturbance is not anticipated: however, if conditions change, the Asbestos Program Manager will re-evaluate the work request prior to proceeding.
- ACM is present and may be disturbed.

**The following work practices shall be employed to avoid disturbing asbestos:**

\_\_\_\_\_  
\_\_\_\_\_

**The following PPE shall be used/worn during the work to protect the workers:**

\_\_\_\_\_  
\_\_\_\_\_

**Special Practices and/or Equipment Required:**

\_\_\_\_\_  
\_\_\_\_\_

**APPROVED BY:**

Asbestos Program Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Environmental Manager: \_\_\_\_\_ Date: \_\_\_\_\_

**Reminder:**

- One (1) copy of ACM Abatement Documents shall be forwarded to Asbestos Program Manager & Environmental Manager.
- A copy of this completed form will be kept at the project site for the duration of the activities involving ACM.

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# Unit 04 Training

OSHA regulations mandate that building owners and employers exercise due diligence to provide adequate training on asbestos awareness and hazard communication to employees and contractors about the presence of ACM and PACM. Adequate asbestos awareness will be provided via the hazard communication computer based training (CBT).

This awareness training shall be provided to all mill employees.

\_\_\_\_\_  
Name (Print) / Clock Number

\_\_\_\_\_  
Date

\_\_\_\_\_  
Trainer

\_\_\_\_\_  
Date

## SUMMARY OF CHANGES

Section(s)	Revision	Review	Date	Description of Change
All	1		11/10/11	Company name change
All	1	Michael Yoder	12/15/17	Reviewed for accuracy
Bottom of page 8	1		7/31/18	Verbiage removed