

International Paper - Franklin Mill

Asbestos Management Policy

Exposure to asbestos presents a potentially serious health hazard to workers. It is the policy of the Franklin Mill to handle, remove and dispose of all asbestos containing materials in compliance with all Virginia Occupational Safety and Health Administration, Environmental Protection Agency, and International Paper requirements.

1.0 PURPOSE

The purpose of this policy is to outline the requirements for proper management, identification and handling of asbestos containing materials in order to prevent and minimize employee exposure to airborne asbestos fibers in accordance with IP Corporate, OSHA, EPA, and Virginia DPOR requirements.

2.0 SCOPE

2.1 This procedure applies to all Franklin Mill employees, visitors, and contractors.

2.2 This procedure must be followed whenever personnel are working with, on, or near asbestos containing materials during abatement, maintenance, cleaning, repair, inspection, or servicing operations.

3.0 RESPONSIBILITIES

3.1 Asbestos Coordinator

3.1.1 The mill's Supervisor, Safety and Industrial Hygiene, is designated as the site Asbestos Coordinator and must oversee the overall implementation and management of this policy.

3.1.2 Periodically review and revise the Asbestos Management Policy as required to remain in compliance with Corporate, VOSH, and EPA requirements.

3.1.3 Approve laboratories for analysis of bulk and air samples.

3.1.4 Coordinate air monitoring services as required.

3.1.5 Maintain records of asbestos abatement activities and exposure monitoring results.

3.1.6 Provide final approval on all contractor related activities that would involve notifications, variances or emergency notification. Handle all communication with Virginia OSHA that would be a part of the contractor's notification.

3.1.7 Review and approve contractor asbestos and safety programs prior to the contractor performing work on site.

3.2 Maintenance Asbestos Inspector

3.2.1 Coordinate bulk sampling activities as requested by mill employees and management.

3.2.2 Coordinate bi-annual inspection of ACM per Virginia asbestos regulations to ensure that all identified ACM remains in good condition.

3.2.3 Maintain the site asbestos inventory.

3.2.4 Initiate corrective actions- such as contractor notifications, barricading area, etc.- based on the condition of asbestos materials.

3.2.5 Submit work requests for asbestos abatement to the appropriate Maintenance Planner when asbestos material can cause potential employee exposures.

3.2.6 Conduct pre-job inspections, as requested by Planners and Contractor Managers, to determine if asbestos abatement is needed prior to or during work activities.

3.2.7 Act as Competent Person as defined by this procedure.

3.2 Environmental Engineering Department

3.2.1 Approve the disposal site and procedures for handling asbestos waste.

3.2.2 Attend preliminary asbestos removal project planning meetings for jobs that involve asbestos abatement activities above 1600 square feet or 2600 linear feet.

3.2.3 Track and approve all manifests associated with the disposal of asbestos containing materials.

3.2.4 Ensure DOT labeling requirements are met prior to shipment.

3.3 Department Management

3.3.1 Perform asbestos awareness level training for all employees who have asbestos containing materials in their work area.

3.3.2 Ensure the provisions of this procedure are followed by employees within the department.

3.4 Medical Department

3.4.1 Provide medical examinations for all asbestos abatement personnel as outlined in this procedure.

3.4.2 Maintain asbestos related medical records for the duration of the employees' employment plus 30 years.

3.4.3 File notices of one time exposures and chest x-rays with the employees medical records.

3.5 Purchasing Department

3.5.1 Ensure that the Franklin Mill and contractors use and install materials that are asbestos free.

3.5.2 Ensure contractors who are hired to perform asbestos abatement activities are approved and licensed as required by this procedure.

3.6 Contractor Manager/Maintenance Planners

3.6.1 Ensure that all replacement materials have been approved for use through the Franklin Mill Chemical Management Policy. In addition, monitor contractor and subcontractor activities to ensure

that only asbestos-free replacement materials are installed during a project.

3.6.2 Coordinate an inspection of employee/contractor work areas by the Maintenance Asbestos Inspector to determine the presence and appropriate handling of asbestos containing materials.

3.6.3 For asbestos abatement projects:

3.6.3.1 Notify the Asbestos Coordinator or the Maintenance Asbestos Inspector of all asbestos abatement projects, regardless of size, as soon as possible.

3.6.3.2 Obtain Contractor's Asbestos Removal and Handling procedures on asbestos jobs which exceed 160 square feet or 260 linear feet prior to beginning the job and submit the procedures to the Asbestos Coordinator for review.

3.6.3.3 Hire a third party Project Monitor to provide oversight and air monitoring of abatement jobs exceeding 160 square feet or 260 linear feet.

3.6.3.4 Coordinate a preliminary planning meeting with the operating department supervisor, Environmental Engineering, Loss Prevention, and the contractor for jobs that involve asbestos abatement activities above 1600 square feet or 2600 linear feet.

3.7 All Employees

3.7.1 Treat all suspect materials as if they were asbestos containing material unless:

3.7.1.1 The area is clearly labeled with boundaries as asbestos-free

3.7.1.2 A representative area is sampled by a trained inspector, analyzed by an accredited laboratory, and found to be asbestos free, or the trained inspector identifies the material as fiberglass or mineral wool upon sampling.

In the case of an emergency repairs, where analysis time is not available treat the material as asbestos;

3.7.2 Install barricades in areas where damaged and friable suspect material has been found.

3.7.3 Notify department supervision if damaged, friable asbestos containing materials or suspect ACM is found.

3.7.4 Follow the provisions of this Policy and perform only those work activities for which they have been trained.

3.8 Asbestos Contractor

3.8.1 Comply with all applicable regulations, including the OSHA and EPA asbestos standards and the Virginia DPOR regulations.

3.8.2 Provide, upon request, current asbestos licenses for all workers and supervisors on-site.

3.8.3 Notify International Paper employees and contractors working near abatement activities of the work being performed.

3.8.4 Comply with the specific provisions of this procedure as they relate to asbestos contractors.

4.0 DEFINITIONS

4.1 Abatement or "Asbestos Project" - means any activity involving job set-up for containment, removal, encapsulation, enclosure, renovation, repair, demolition, construction, alteration, or maintenance of asbestos containing material. These methods provide procedures to control fiber releases from asbestos containing materials. (Note: this includes asbestos containing roofing, flooring, and siding).

4.2 ACM - Asbestos Containing Material

4.3 Action Level - means an airborne concentration of asbestos of 0.05 fibers/cc calculated on an 8 hour time weighted average. Where exposures reach or exceed this level, additional requirements such as medical surveillance and air monitoring are required.

4.4 AIHA - American Industrial Hygiene Association

4.5 Air Monitoring - The process of measuring the asbestos fiber content in the air over a specified period of time.

4.6 Asbestos - a group of naturally occurring magnesium-silicate minerals that occur in fibrous form. The most common of these minerals include: amosite, chrysotile, crocidolite, tremolite, actinolite, and anthophyllite.

4.7 Asbestos Contractor's License - an authorization issued by the Department of Professional and Occupational Regulations (DPOR) permitting a person to enter into contract to abate asbestos containing materials. These workers have been properly trained and qualified to perform Class I, II, III, and/or IV asbestos work.

4.8 Asbestos Inspector – an authorized person who has been trained through an approved DPOR course to perform evaluations to identify, classify, record, sample, test and prioritize potential friable and non-friable ACM. Contracted Inspectors must be licensed by DPOR.

4.9 Asbestos Worker - means any person engaged in an asbestos abatement activity, and trained per DPOR requirements as an asbestos worker. This person has received and maintained the appropriate training required to perform the necessary ACM/PACM work (Class I-IV asbestos work).

4.10 Asbestos Supervisor - means any person trained per DPOR requirements as a supervisor of asbestos abatement activity. An asbestos supervisor must be present at each job site.

4.11 Clearance Limit = 0.01 f/cc. The maximum allowable airborne concentration that must be obtained before allowing the removal of a negative pressure enclosure or allowing reentry into an area following a significant asbestos release.

4.12 Competent Person – A person who is capable of identifying existing and predictable hazards in the surroundings or working conditions and who meets the following requirements:

4.12.1 Specially trained to oversee asbestos work.

4.12.2 Capable of identifying asbestos hazards in the workplace, selecting the appropriate control strategy to minimize potential asbestos exposures.

4.12.3 Has the authority to take prompt corrective measures to eliminate any subsequently identified hazard.

4.13 Demolition - The wrecking or taking out of any load-supporting structural member and any related removing or stripping of friable asbestos materials.

4.14 Disturbance - Activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. It includes cutting away small amounts of ACM and PACM (no greater than the amount which can be contained in one standard sized glove bag or waste bag) to access a building or process component.

4.15 DOT - Department of Transportation

4.16 DPOR - Department of Professional and Occupational Regulations

4.17 Emergency Renovation Operations - A renovation 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.

4.18 Employee Exposure - means an exposure to airborne asbestos that would occur if the employee was not using respiratory equipment.

4.19 Encapsulation - the treatment of ACM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the materials and binds its components together (penetrating encapsulant).

4.20 EPA - Environmental Protection Agency

4.21 Excursion Level - the airborne concentration for which workers cannot be exposed to for more than 30 minutes during the day. The excursion level for asbestos is 1.0 fibers/cc.

4.22 Fiber - A particulate form of asbestos five (5) micrometers or longer, with a length to width ratio of at least three (3) to one (1).

4.23 Friable Asbestos Material - Any asbestos material that can be crushed or reduced to powder by hand pressure.

4.24 High Efficiency Particulate Air (HEPA) Filter - A filter capable of trapping and retaining at least 99.97% of 0.3 micrometer diameter mono-dispersed particles.

4.25 Inadvertent Exposure - means a potential exposure to asbestos resulting from some type of incident, (e.g., emergency, improper work practice, failure of an established control measure, etc.). The designation of an inadvertent exposure should involve the site Asbestos Coordinator, or designee's, exposure assessment of the incident.

4.26 Job Site - a location on International Paper's Franklin Mill, which is in the proximity of the task being performed.

4.27 Miscellaneous Material - means those materials that could contain asbestos, and are not classified as thermal system insulation or surfacing materials. Such materials include, but are not limited to: floor and ceiling tiles, gasket, lab hoods, etc.

4.28 NACM - Non-Asbestos Containing Material - means the material in question (e.g., TSI, surfacing, or miscellaneous material) contains less than 1% asbestos.

4.29 Negative Air System - a HEPA filtered exhaust system that establishes a negative pressure inside an enclosure in relation to the outside during asbestos abatement activities.

4.30 NESHAP - National Emission Standards for Hazardous Air Pollutants

4.31 Non-Friable ACM - any asbestos material that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.

4.32 NVLAP - National Voluntary Laboratory Accreditation Program, a program sponsored by the United States Department of Commerce, National Institute of Standards and Technology (NIST). NVLAP accredited laboratories participate in a program to identify the various types of asbestos and their concentrations in bulk samples.

4.32 PACM - Presumed Asbestos Containing Material - thermal system insulation, surfacing material, or miscellaneous material which potentially contains asbestos. Such materials are presumed to contain asbestos, unless appropriate written documentation or representative bulk samples indicate otherwise.

4.33 PCM - Phase Contrast Microscopy. The analytical method used to determine the quantity of airborne fibers collected during air monitoring.

4.34 Permissible Exposure Limit (PEL) - the time weighted average concentration for a normal 8 hour workday and 40 hour work week to which all workers may be repeatedly exposed, day after day, without adverse effect. The PEL for asbestos is 0.1 fibers/cc.

4.35 PLM - Polarized Light Microscopy. The analytical method used for the identification of the various types of asbestos.

4.36 Removal - Means all operations where ACM/PCM is taken out or stripped from structures or substrates, including demolition operations.

4.37 Repair - means the overhauling, rebuilding, reconstructing or reconditioning of structures or substrates, including encapsulation or other repair of ACM/PACM attached to structures or substrates.

4.38 Regulated Area - An area established by the employer to demarcate areas where airborne concentrations of asbestos exceeds or can reasonably be expected to exceed the 0.01 fibers/cc. The regulated area may take the form of:

- a. a temporary enclosure
- b. barricaded area and require the use of respiratory protection, as well as prohibit eating drinking, smoking, or chewing tobacco.

4.39 Renovation - The removing or stripping of friable asbestos material used on any pipe, duct, boiler, tank, or other area.

4.40 Surfacing Material - means a material that is sprayed-on, 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).

4.41 TEM - Transmission Electron Microscopy. Used for the identification and quantification of airborne fibers collected on filters, as well as bulk analysis of floor tile.

4.42 Thermal System Insulation - means insulation applied to pipes, fittings, boilers, breaching, tanks ducts, or other structural components to prevent heat loss or gain.

4.43 Waste Generator - Any owner or operator of a source whose act or process produces asbestos containing waste material.

4.44 Waste Manifest - The shipping document, required to be originated and signed by the waste generator, used to track and substantiate the disposition of asbestos containing waste material.

5.0 REFERENCES

5.1 Virginia Occupational Safety and Health Administration Regulations (29 CFR 1910.1001, 29 CFR 1910.1101, 29 CFR 1926.1101)

5.2 Environmental Protection Agency National Emission Standards for Hazardous Air Pollutants (NESHAPs)

(40 CFR 61 Subpart M, 40 CFR Part 763 Subpart E)

5.3 International Paper's Health and Safety Program Guideline for Asbestos.

5.4 Department of Professional and Occupational Regulations, Virginia Asbestos Licensing Program

5.5 Franklin Mill, Respiratory Protection Procedure

5.6 Franklin Mill, Exposure Assessment & Monitoring Program

5.7 Franklin Mill, Incident Investigation Procedure

5.8 Franklin Mill Chemical Management Policy

6.0 PROCEDURE

6.1 Limits of Exposure

6.1.1 Employee exposure to asbestos must be kept below 0.1 fibers per cubic centimeter for an eight-hour time weighted average. This level applies to:

6.1.1.1 Unprotected employees engaged in their normal work assignments immediately outside of restricted asbestos work area.

6.1.1.2 Employees who come into contact with asbestos containing materials as a result of their work activities, and

6.1.1.3 Asbestos concentrations inside the respirator of employees working with asbestos materials.

6.1.2 Employee exposure to asbestos must not exceed the Excursion Limit of 1.0 fibers/cc for 30 minutes.

6.2 Identification of Asbestos Containing Materials

6.2.1 All suspected asbestos containing material shall be treated as if it were asbestos until proven otherwise. A list of potential asbestos containing materials is listed in Attachment 1.

6.2.1.1 The only acceptable methods of confirming the presence or absence of ACM are:

6.2.1.1.1 To obtain written documentation (e.g., site inventory with supporting documentation, MSDS, or other written confirmation) indicating that asbestos is not present

6.2.1.1.2 Through representative bulk sampling.

6.2.1.1.3 Through a trained inspector who can identify the material as fiberglass or mineral wool. This does not apply if the material has insulation mud or is installed adjacent to ACM or PACM materials.

6.2.1.1.4 Through labels which clearly identify the boundaries of ACM or NACM.

6.2.2 Only trained asbestos inspectors may sample material suspected of containing asbestos. If conditions do not allow for an employee to wait for results of this evaluation, the material in question must be considered asbestos and licensed asbestos contractors must handle this material.

6.2.3 Bulk sample analysis of this sample must be evaluated by a NVLAP certified laboratory.

6.2.4 As part of pre-job planning, an asbestos inspection of suspect material must be performed by the Maintenance Asbestos Inspector to prevent asbestos exposures, identify needed abatement, and to prevent work interruptions.

6.2.5 Extensive efforts are made to label asbestos containing materials. However, not all asbestos containing and non asbestos containing materials are labeled. For this reason, employees must assume the suspect material contains asbestos if the material is not labeled.

6.3 Inventory

6.3.1 The Maintenance Asbestos Inspector shall maintain an inventory of ACM, PACM, and NACM located within each department.

6.3.2 The quantity of ACM, PACM, NACM present may be estimated. Where feasible, a more specific amount is indicated.

6.3.3 The site inventory shall be reviewed once per year. The inventory is also updated as abatement work is completed.

6.3.4 This information shall be accessible to all employees and contractors. A hard copy of the inventory is located in Loss Prevention.

6.4 Bi-Annual Inspection

6.4.1 A bi-annual inspection of all asbestos to assess the condition of the material will be performed by the Maintenance Asbestos Inspector.

6.4.2 The Maintenance Asbestos Inspector is responsible for ensuring the necessary work requests are generated; as well as prioritizing all necessary abatement actions.

6.4.3 A documented action plan shall be developed and implemented for any significantly damaged ACM, as well as damaged ACM with high potential for exposure or disturbance.

6.5 Damaged Materials If damaged and friable asbestos containing materials are found, the affected area must be barricaded to prevent exposure to the material

6.5.1 All points of access should be barricaded to protect others from entering this area.

6.5.2 Employees must notify their supervisor as soon as possible of the damaged material. The supervisor must then contact the Maintenance Asbestos Inspector to initiate abatement.

6.5.3 Access to the barricaded area shall be limited to asbestos abatement persons only. At a minimum, those entering the regulated area to determine the appropriate abatement action must wear a half mask respirator.

6.6 Asbestos Work Practices

6.6.1 No employee is permitted to work with or adjacent to exposed friable asbestos insulation, unless performing abatement work on this material.

6.6.2 The use of chain falls, or the like, strapped around asbestos insulation, or unknown insulation, is not permitted.

6.6.3 All surfaces shall be maintained as free as practical of ACM/PACM waste, debris, and/or accompanying dust.

6.6.4 All waste, debris, and accompanying dust in an area containing accessible ACM/PACM, or visibly deteriorated ACM/PACM must be abated by a licensed asbestos contractor.

6.6.5 All spills or sudden releases of ACM/PACM must be cleaned up as soon as possible by a licensed asbestos contractor.

6.6. Sanding of asbestos containing flooring material is prohibited.

6.6.7 Stripping of finishes must be conducted using low abrasion pads at speeds lower than 300 rpm and wet methods.

6.6.8 Burnishing or dry buffing may be performed only on asbestos containing flooring which has sufficient finish so that the pad cannot contact the asbestos containing material

6.7 Contractor Requirements

6.7.1 Only Department of Professional and Occupational Regulations trained asbestos workers/supervisors are permitted to perform any asbestos abatement activities.

6.7.2 A trained asbestos supervisor must be on site at all times while abatement activities are being performed.

6.7.3 Any significant variation from routine methods of removal must be approved by the Asbestos Coordinator prior to initiating the project.

6.7.4 All personnel performing abatement activities must use personal protective equipment such as respiratory protection, protective clothing, safety glasses and gloves.

6.7.5 All asbestos waste, including PPE, must be handled, disposed of and transported in accordance with EPA regulations and International Paper requirements.

6.7.6 For all asbestos abatement work, the Pre Job Planning Asbestos Abatement Checklist (Attachment 2) must be completed by an IP Competent Person.

6.7.7 Barricade the abatement area and/or construct enclosures to control the exposure and to establish the regulated area.

6.7.8 The contractor's supervisor must make frequent and regular inspections of the asbestos worksite to ensure that the materials, equipment, work practices, and control measures are proper and effective.

6.7.9 Inspections shall be made a minimum of once per shift or at anytime an employee requests or concern is voiced.

6.7.10 Random audits of contractor work activities will be made by the Maintenance Asbestos Inspector. These audits shall insure the workmanship, practices, and the control measures are in compliance with regulations and are effective. Attachment 3 will be used for these audits.

6.7.11 When the asbestos job is completed, the work area shall be inspected by the contractor's asbestos supervisor.

6.7.12 At completion of the asbestos job, the contractor shall submit the following information to the Asbestos Coordinator:

6.7.12.1 The results of any air monitoring conducted outside of the regulated area, as well as the results associated with the clearance monitoring.

6.7.12.2 The location and amount of ACM/PACM that was removed in the area where the work was completed.

6.8 Training

6.8.1 Employees who work with or in an area that contains asbestos must receive annual asbestos awareness training.

6.8.2 The Maintenance Asbestos Inspector must attend annual refresher courses that are approved by DPOR for Asbestos Inspector and Asbestos Supervisor training.

6.9 Medical Surveillance

6.9.1 All current and past asbestos abatement employees are included in the medical surveillance program consisting of: a medical questionnaire, examination, pulmonary function test, and chest x-ray (depending on age and years of exposure). The mill Medical Department manages and conducts the asbestos medical evaluations based on current accepted medical practice.

6.9.2 Medical evaluations for mill employees directly exposed to a friable asbestos release or spill will be offered medical evaluations and documentation as described in section 6.10.3.

6.10 Accidental Disturbance of Asbestos Containing Materials

6.10.1 Emergency Response Procedures

6.10.1.1 Where thermal system insulation or surfacing material has been released due to vibration, fire, mechanical or other action, the affected area shall be barricaded immediately. This area shall be barricaded and treated as a regulated area until the cleanup is complete or representative monitoring data indicates otherwise.

6.10.1.2 The IP competent person shall perform an exposure assessment in order to determine the urgency in which the ACM/PACM must be abated, the extent of employee exposure, and to determine the appropriate abatement action.

6.10.1.3 Clearance monitoring must be performed prior to any non-asbestos abatement employee entering the area.

6.10.1.4 Employees or contractors who were in the immediate area during a disturbance of friable asbestos containing materials will be identified, and considered potentially exposed to ACM/PACM.

6.10.1.5 In any instance in which an employee or contractor is considered potentially exposed to ACM/PACM he/she will:

6.10.1.5.1 Immediately leave the area to prevent inhalation of airborne asbestos fibers.

6.10.1.5.2 Travel to the nearest safety shower and thoroughly drench himself or herself with water before removing any contaminated clothing (water prevents asbestos fibers from becoming airborne, eliminating or dramatically reducing breathable asbestos fibers).

6.10.1.5.3 Notify the employee's supervisor by the best available means (phone, radio, intercom, etc.) and remain there until assistance arrives (this is to prevent spreading and exposing others to asbestos contamination). The employee's supervisor must then contact the asbestos planner or the Safety and Industrial Hygiene Supervisor so that appropriate abatement and testing can be performed.

6.10.1.5.4 Remove the wet clothing, shower, and don replacement clothing (contaminated clothing will be tested, if necessary, and then properly disposed of as asbestos-contaminated waste).

6.10.1.6 Whenever an incident involves potential employee exposures bulk samples of the spilled material must be collected and analyzed.

6.10.1.7 Whenever a chemical release, fire, or other emergency occurs, the immediate danger must be addressed first.

6.10.2 Corporate Notifications and Reporting

6.10.2.1 Loss Prevention shall notify Corporate Health, Safety and Workers' Compensation of any employee or contractor identified as potentially exposed to asbestos. Notification may be made by email to HSWCNotifications@ipaper.com or by phone (901) 419-3916.

6.10.2.2 Corporate Health, Safety and Workers' Compensation will make the determination whether or not it will be necessary to conduct the Medical Evaluation. This determination will be based upon the following information to be provided by Loss Prevention to Corporate Health, Safety and Workers' Compensation.

6.10.2.2.1 Details of the incident, including a copy of the incident investigation.

6.10.2.2.2 Available bulk and/or air sampling results and any applicable Material Safety Data Sheets (MSDS).

6.10.2.2.3 A copy of the employee's duties as they relate to the potential exposure

6.10.2.2.4 Work histories of the affected employees, including information regarding any prior exposures to asbestos and any previous asbestos medical evaluations.

6.10.2.3 A First Report of Injury will be completed for International Paper employees, if instructed by the Regional Workers' Compensation Coordinator.

6.10.2.4 Report all potential employee exposures to ACM/PACM in the I&I System as a "near miss", unless a higher category of incident applies (e.g., OSHA recordable or lost time case).

6.10.2.5 Employees identified as potentially exposed to asbestos will be given a letter with a copy placed in their medical file describing the incident along with medical and industrial hygiene sampling records (if available).

6.10.3 Medical Evaluation

6.10.3.1 When a baseline medical evaluation is determined to be appropriate by Corporate Health, Safety and Workers' Compensation, the potentially exposed employee(s) will be referred to the IP Franklin Medical Department to complete a baseline medical evaluation. Prior to the baseline medical evaluation, the employee's supervisor will provide Medical with:

6.10.3.1.1 Details of the incident

6.10.3.1.2 Available bulk and/or air sampling results as obtained from Loss Prevention

6.10.3.1.3 A copy of the employee's duties as they relate to the potential exposure

6.10.3.1.4 Work histories of involved employees

6.10.3.2 Baseline Medical Evaluation Protocol

6.10.3.2.1 The baseline evaluation will include a review of an asbestos health questionnaire completed by the employee.

6.10.3.2.2 Procedures and documentation for Asbestos Medical Evaluations will be performed as required by the IP Franklin Medical Department.

6.10.3.3 Follow-Up Asbestos Medical Evaluations

6.10.3.3.1 Corporate Health, Safety and Workers' Compensation will review the employee medical records to determine the need for follow-up asbestos medical evaluations. Such follow-up evaluations will only be performed when medically necessary.

6.10.3.3.2 When an employee who received a baseline medical evaluation terminates employment with International Paper, and the exposure was at least five years prior to the date of termination, a termination evaluation consisting of an asbestos health questionnaire, chest x-ray, and screening spirometry will be offered.

6.10.3.4 Documentation And Communication Of Medical Evaluations

6.10.3.4.1 The affected employee(s) asbestos medical record and supporting documentation will be sent to Corporate Health, Safety and Workers' Compensation for review and comment.

6.10.3.4.2 All documentation related to the medical evaluations will be kept in the employees' medical file.

6.10.3.5 Refusal To Participate In Medical Evaluations

6.10.3.5.1 If Corporate Health, Safety and Workers' Compensation determines that a baseline or follow-up medical evaluation is medically necessary, and the employee declines to participate, the employee will be required to sign a copy of the letter titled, Acknowledgement for Declining Medical Evaluation, available in Medical.

6.10.3.5.2 Any subsequent request for a medical evaluation by an employee who has previously declined a medical evaluation will be discussed with Corporate Health, Safety and Workers' Compensation to review the need for such an examination.

6.10.3.6 Incident Investigations

6.10.3.6.1 An incident investigation will be held any time International Paper employees or contractors working are exposed to friable asbestos.

6.10.3.6.2 The investigation team should include, but not be limited to, the employee's supervisor, Asbestos Coordinator, the exposed employee, and a union representative. The supervisor shall lead the investigation team. If contractors are involved, the contractor manager is responsible for leading this investigation and ensuring that recommended actions are completed.

6.10.3.6.3 The Franklin Mill Incident Investigation Procedure should be followed to ensure uniformity in conducting incident investigations.

7.0 **DOCUMENTATION**

7.1.1 The following records must be retained as follows:

7.1.2 Material Safety Data Sheets (MSDS), during use of the chemical and 30 years thereafter.

7.1.3 Building or facility prints/specifications: duration of ownership and transferred to subsequent owners.

7.1.4 Most current inventory: Duration of ownership and transferred to subsequent owners.

7.1.5 Bulk and air sampling data: 30 years.

7.1.6 Medical Surveillance Records: duration of employment and thirty years thereafter.

7.1.7 Training records: 3 years

7.1.8 Incident Investigation Reports for employee exposures: thirty years

8.0 **APPROVAL AND ISSUE**

This procedure is approved by the Franklin Mill Safety and Health Committee.

9.0 **SAFETY**

Follow all applicable International Paper, Franklin Mill Safety and Health Procedures and Policies where applicable.

Attachment 1

POTENTIAL ASBESTOS-CONTAINING MATERIALS

CAULKING MATERIALS/ADHESIVES:

- * Packing materials (for wall/floor penetrations)
- * Caulking/purries
- * Adhesives
- * Joint, taping, caulking or spackling compounds used on dry wall, or grouts or plasters

WALL/CEILING MATERIALS:

- * Drywall/wallboard
- * Vinyl wall panels
- * Cementitious wallboard
- * Wall coverings
- * Spackling compounds
- * Ceiling tiles and lay-in panels
- * Wallboard joints/seams

ROOFING MATERIALS

- * Roofing Shingles
- * Roofing felt;
- * Base flashing
- * Roofing mastics
- * Roofing products such as asphalt asbestos shingles, asbestos cement shingles, roofing felts and patching compounds

SURFACING MATERIALS:

- * Spray-applied fireproofing materials added to protect metal beams, ceilings, or supports;
- * Acoustical/decorative plaster or treatment;
- * Smooth plaster;
- * Textured paints/coatings;

- * Sprayed-on or trowel-applied acoustic insulation on ceilings or walls;
- * Taping compounds;
- * Paints and textured coatings; and
- * Blown-in insulation.

FLOORING MATERIALS:

- * Floor tile
- * Vinyl sheet flooring
- * Linoleum floor covering
- * Flooring mastics
- * Vinyl asbestos tile
- * Asphalt tile
- * Backing
- * 9-inch and, occasionally 12-inch, square vinyl or asphalt floor tiles

MISCELLANEOUS MATERIALS:

- * Older laboratory fume hoods (interior surfaces generally) of bench tops;
- * Fabric vibration/isolation joints on heating, ventilation, and air conditioning fans;
- * Asbestos millboard used as a stiff outside covering on removable insulation (e.g., removable boiler insulation);
- * Mastic for tank coatings or adhesives;
- * Cooling tower slats, baffles, fill, or structures;
- * Wallboards, elevator shafts, and exterior wall coverings (e.g., Transite);
- * Electrical insulating papers;
- * Electrical insulation/cloth;
- * Electrical dusts (cable chases);
- * Electrical panel partition;
- * Fire/welding blankets;
- * Heat-resistant protective clothing (e.g., aluminized gloves, firesuits, etc.);

- * Asbestos-reinforced plastics;
- * Incandescent recessed fixtures;
- * Brake and clutch linings;
- * Chalkboards;
- * Mechanical packings, oil seals;
- * Compressed Gaskets;
- * Electrical insulation; and
- * Laboratory oven gaskets

ATTACHMENT 2
FRANKLIN MILL
ASBESTOS ABATEMENT/PROJECT PRE-JOB PLANNING CHECKLIST

PROJECT START DATE:

CONTRACTOR MANAGER:

IF CONTRACTOR ABATEMENT, NAME OF CONTRACTOR TO PERFORM ABATEMENT

LOCATION OF PROJECT & EQUIPMENT INVOLVED
 (If available, provide drawings of area in which asbestos has been identified)

HAS AREA BEEN SAMPLED TO DETERMINE ITS PRESENCE

(Refer to Attachment 3B for list of products which potentially contain asbestos)

TYPE OF MATERIAL TO BE ABATED:

CONDITION OF MATERIAL

AMOUNT OF MATERIAL TO BE ABATED:

IF CONTRACTOR ABATEMENT, NAME OF CONTRACTOR TO PERFORM ABATEMENT AND CONTACT

NUMBER OF DAYS REQUIRED TO COMPLETE ABATEMENT

IF CONTRACTOR IS USED TO PERFORM ABATEMENT, THE FOLLOWING MUST BE PROVIDED (BY THE CONTRACTOR):

DESCRIPTION OF THE ABATEMENT PROCEDURE TO BE USED AND MUST PROVIDE A LAYOUT OF THE ENGINEERING CONTROLS (eg: HEPA vacuum locations) USED (Refer to Attachment 3-A for project specification requirements):

| |
|--|
| |
| |
| |
| |
| YES: _____ NO: _____ IF YES, HAVE RESULTS BEEN OBTAINED? YES: _____ NO: _____ Assumed Material Contained ACM: [] yes [] no |
| SURFACING MATERIAL ¹ : _____ THERMAL SYSTEM INSULATION: _____ |
| FRIABLE: _____ NON-FRIABLE: _____ |
| _____ LINEAR FEET or _____ SQUARE FEET or _____ CUBIC FEET IF QUANTITY IS GREATER THAN: 10 LINEAR FEET 10 SQUARE FEET 10 CUBIC FEET 20 DAY NOTIFICATION REQUIRED, UNLESS JOB IS CLASSIFIED AS AN EMERGENCY |
| |
| |

¹ SURFACING MATERIAL INCLUDE: TRANSITE, FLOOR TILE, ETC....
 THERMAL SYSTEM INSULATION INCLUDES: PIPE INSULATION, TANK MASTIC, ETC....

THE CONTRACTOR MUST HAVE THE FOLLOWING PROGRAMS:

WRITTEN RESPIRATORY PROTECTION PROGRAM _____
PERSONAL PROTECTIVE EQUIPMENT POLICY _____
ASBESTOS ABATEMENT POLICY _____
FALL PROTECTION POLICY _____
OTHER POLICIES PER THE COPP MANUAL _____

OBTAIN COPY OF CONTRACTOR LICENSE. CONTRACTOR MUST BE LICENSED IN THE STATE OF VIRGINIA TO PERFORM ABATEMENT

CONTRACTOR LICENSED: [] yes
WORKERS/SUPERVISOR LICENSED: [] yes [] no

CONTRACTOR NOTIFIED THAT ANY NOTIFICATIONS REQUIRED TO BE SUBMITTED TO THE STATE MUST BE REVIEWED BY LOSS PREVENTION PRIOR TO SUBMITTAL TO THE STATE

[] YES [] NO

WASTE DISPOSAL METHOD IDENTIFIED:

IP DUMPSTER TO BE USED: [] YES
NOTE: IP DUMPSTER ONLY TO BE USED FOR SMALL TO MEDIUM JOBS

CONTRACTOR WILL OBTAIN DUMPSTER: [] YES

ENVIRONMENTAL HAS APPROVED LANDFILL IN WHICH ASBESTOS IS TO BE DISPOSED OF: [] YES

AIR MONITORING TO BE PERFORMED BY:

IS LABORATORY AIHA CERIFIED:

[] YES [] NO
Certification Number: _____

TYPE OF AIR SAMPLES TO BE OBTAINED:

PERSONAL: [] YES [] NO

AREA: [] YES [] NO

CONTRACTOR HAS BEEN PROVIDED A COPY OF THE FRANKLIN MILL ASBESTOS MANAGEMENT POLICY AND THOSE SECTIONS APPLICABLE TO THIS ABATEMENT HAVE BEEN REVIEWED

[] YES [] NO

INDUSTRIAL HYGIENE TEAM NOTIFIED OF ASBESTOS ABATEMENT TO BE PERFORMED

[] YES [] NO

OTHER ACTIVITIES THAT ARE REQUIRED TO BE PERFORMED:

ASBESTOS ABATEMENT WORK NOTICE POSTED (REFER TO GENERAL POLICY, ATTACHMENT 1)

[] YES [] NO

MATERIAL TO BE ABATED OR REPLACED TO BE LABELED "DANGER ASBESTOS....." OR "ASBESTOS FREE"

[] YES [] NO

PRELIMINARY PLANNING MEETING HELD WITH ENVIRONMENTAL, LOSS PREVENTION, AND THE CONTRACTOR FOR ABATEMENT EXCEEDING 1600 SQ. FT OR 2600 LINEAR FT.

[] YES [] NO [] NA

DURING ABATEMENT OR UPON COMPLETION:

AUDIT OF CONTRACTOR ACTIVITIES PERFORMED.
FORM IN GENERAL POLICY ATTACHMENT 4
COMPLETED

YES NO

MONITORING RESULTS FILED IN PROJECT FILE
UPON RECEIPT FROM INDUSTRIAL HYGIENE TEAM

YES NO

ATTACHMENT 3

ASBESTOS ABATEMENT AUDIT FORM

Audit completed by:

Date:

P.O./W.O. Number:

Who is performing abatement :

| ITEMS REVIEWED | COMMENTS |
|--|----------|
| <p>I. <u>Worksite Enclosure</u></p> <ul style="list-style-type: none">a. Warning Signs and Barricade adequate?b. Floor covered.c. Walls covered.d. Ventilation off.e. All edges sealed. | |
| <p>II. <u>Tools and Equipment</u></p> <ul style="list-style-type: none">a. HEPA Vacuum Used:b. HEPA filtered negative air machine used:c. Water/spray used:d. Wetting agent used:e. Glove bag used properly:f. Decon facility adequate: | |

| ITEMS REVIEWED | COMMENTS |
|--|-----------------|
| <p>III. <u>Personal Protective Equipment</u></p> <ul style="list-style-type: none"> a. Disposable clothing utilized (ie: Tyvek) b. Head and feet covered: c. Respirator Used. Type? d. Respirator cartridges used: e. Rubber gloves: | |
| <p>IV. <u>Work Practices</u></p> <ul style="list-style-type: none"> a. Removed material promptly bagged? b. Material removed wet? c. Workers decontaminated before leaving work area. (If 2 suits used outside suit removed, and clean suit put on?) d. Personal/Area air sampling performed. e. Waste properly disposed: | |