

Hazard Communication Plan

ASARCO – Encycle Facility

Asbestos Abatement, Waste Removal,
and Demolition

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Hazard Communication Plan

ASARCO – Encycle Facility
Asbestos Abatement,
Hazardous Waste Removal,
and Demolition

Prepared for:
ASARCO – Encycle Facility
Asbestos Abatement, Waste
Removal, and Demolition
Project
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1.0 Purpose

This Hazard Communication Plan (Plan) establishes methods for providing information for individuals and contractors working on the ASARCO-Encycle demolition project located at 5500 Up River Road, Corpus Christi, TX (site). Site specific topics covered under this plan include hazardous materials, hazardous work areas, training, site orientation, emergencies, and check-in and check-out procedures.

2.0 Scope

This Plan establishes communication requirements for work activities at the site that may involve hazardous materials, asbestos containing material (ACM), structurally unstable structures, demolition, and areas not to be disturbed among other daily activities at the site. Specifically, this plan identifies labels and other hazard warning methods, Material Safety Data Sheets (MSDSs), hazardous material evaluations, inventories, and employee information and training required to be posted and/or implemented during the course of the this project. The Plan will ensure that:

- Employees have proper training and awareness of hazardous materials and hazardous areas at the site;
- Material Safety Data Sheets (MSDS) are on file for employee access, and;
- Proper hazard identification posting and labeling are accomplished.

3.0 Responsibilities

This Plan applies to employees, subcontractors, transportation contractors, and visitors entering the site that may come in contact with or be exposed to hazardous materials or situations at the workplace while performing their normal duties or during emergency conditions.

Management Shall:

- Provide training and maintain records of training;
- Ensure a list is maintained of all hazardous materials and locations as they are known in the workplace;
- Ensure that MSDSs are readily available and the locations of MSDS information are identified to employees;
- Evaluate the hazard potential of new hazardous materials being discovered in the workplace and develop work strategies as needed;
- Provide guidance for labeling of hazardous materials and areas, and;
- Ensure workplace inspections include evaluations of material safe handling and storage practices.

Supervisors and Crew Supervisors Shall:

- Evaluate the historic use of the facility as it relates to potential chemical and structural hazards that may be encountered during work assignments;
- Identify the hazardous materials associated with jobs under their supervision and make sure their employees have received the appropriate hazard communication training (both general and specialized) before they begin any work assignment involving hazardous materials or hazardous work areas;
- Notify management regarding the presence of new hazardous materials or areas;
- Ensure personnel employ the protective measures prescribed by work plans and local operating instructions when working with hazardous materials or in hazardous work areas;
- Ensure personnel use, transport, and store hazardous materials in a safe manner, and;
- Ensure hazardous material containers are labeled properly.

Staff Shall:

- Familiarize themselves with the facility map, hazard postings, hazard labels, and MSDSs so they can use this information as needed, and;
- Employ the protective measures prescribed by work plans and local operating instructions when working with hazardous materials or in hazardous areas.

4.0 Training

Initial training shall be provided for all employees, subcontractors, transportation contractors, and visitors before entering the site. This training will cover the following topics:

- Overview of Plan policy, including individuals “rights to know”;
- Operations in the work area where hazardous materials are present;
- How to read warning labels and identify the presence or release of hazardous materials;
- Emergency procedures for spills/accidents, including fire hazards, first aid, clean-up, and disposal, and;
- Location and availability of this Plan, hazardous materials lists, and MSDSs.

4.1 Site Orientation and Site Check-in

All project staff and site visitors must receive an initial site orientation. The site orientation was developed to brief the individual on the scope of work, site plans, work procedures, personal protective equipment (PPE), and active work areas. Once the person or group has been through the orientation they will sign an acknowledgement indicating that they are familiar with the site protocols.

All personnel, subcontractors, and visitors are required to sign in at the project office trailer. By doing so, project management can keep track of who is on-site, what activities they are performing, and approximately where they can be found. Project foreman and crew supervisors will be given a 2-way

radio and also be required to list a contact cell phone number as an alternate method to contact the crew.

4.2 Specialized Training

Specialized training shall also be provided on an as-needed basis as new hazards are introduced into the workplace and for hazards that are newly discovered (e.g., from revised sampling and characterization data).

4.3 Recurring Training

On-going training will be provided to employees. Training certificates will be kept in the office trailer and shall be available for review by any member of the project staff. Records will be periodically reviewed to ensure staff certifications are current. Workers will be assigned to work tasks based on experience level and qualifications. Under no circumstance will staff be permitted to work on the site without proper certifications.

5.0 Hazard Information

A list of workplace hazardous materials and hazardous areas can be found in binders distributed among managers, superintendents, and crew supervisors. In addition, original copies of these binders may be found in the project office files. Storage and transportation of hazardous materials must include the appropriate labeling and paperwork as required by local, state, and federal law. Copies of all transportation documentation will be kept at the office trailer.

Workplace MSDSs are located in the project office trailer.

5.1 Structures

Building numbers shall be stenciled onto multiple sides of each structure to provide a means of identification. Hazards will be identified using the abbreviations identified below:

Acronym	Definition
FACM	Friable Asbestos Containing Material
NFACM	Non-Friable Asbestos Containing Material
HazMat	Hazardous Material
Unsound	Structurally Unsound
No Demo	Do Not Disturb Structure

A structure identification (I.D.) binder shall be prepared and circulated among project managers and superintendents. The I.D. binder will contain information in tabular form regarding the types of material that can be found in each structure.

5.2 Exclusion Zones

Exclusion zones will be established for several work elements identified below:

- Areas where ACM mitigation is occurring;
- Areas where hazardous material removal is occurring;
- Areas where decontamination is occurring;
- Hazardous waste interim storage areas;
- Areas that are unsafe due to structural instability, and;
- Areas undergoing active demolition

Depending on the type of work being performed exclusion zones maybe delineated using warning tape, warning signs, barricades, fencing, by posting a watch person, or a combination of approved methods. Only authorized personnel with the appropriate training will permitted in exclusion zones.

5.3 Hazard Clearance

Piping, tanks, vessels and any other structure that may hold impacted liquids or solids will be marked clear upon confirmation that such materials are not present or have been removed and confirmed clean.

Prior to demolition of any structure, the structure shall be certified clear of hazardous materials. A certification notice will be posted on the structure indicating that it is permissible to commence demolition activities. Posting a certification notice will constitute the following:

- Piping, tanks, vessels have been marked clear;
- Confirmation sample results have been received and filed, and;
- A final walk through has been conducted for final verification that hazardous materials have been properly abated.

5.4 Storage

Areas designated for temporary storage of hazardous material must be pre-approved by project management. The storage area shall be clearly delineated utilizing one of the methods described above. All containers of hazardous materials are to be labeled with the following information:

- Complete identity of the material;
- Appropriate hazard warning and safety precautions, and;
- Name contractor storing the material.

If a secondary container is used, it must be labeled with either a copy of the original label or with appropriate generic labels. All warnings and labels must be legible, in English, and prominently displayed on containers.

6.0 Transportation

As trucks enter the facility they will check-in at the office trailer. During check-in each driver will state the purpose for being at the site and be given numbered identification card to be placed in the cab window of the truck. If the driver is new they will be given a site orientation outlining the plans and procedures developed for the site. In addition, drivers will be given a facility map and specific load out access and egress instructions. Once the truck has been loaded it will return to the office to check out of

the facility. During checkout, the driver will return the identification card, be given the appropriate paperwork for the material being transported, and the vehicle and trailer will be inspected for placarding and safety.

7.0 Site Communication

Supervisors and managers will be equipped with 2-way radios. The project channel is designated as channel 7. As a backup to the primary communication method at the site, cell phone numbers of project management and other key personnel will be posted and copies available at the office trailer.

8.0 Emergency Notification Procedures

An emergency evacuation plan shall be posted at the office trailer and reviewed with site personnel during initial orientation. The plan shall identify the following information at a minimum:

- Evacuation Routes;
- Rally Points;
- Emergency Phone Numbers;
- Utility Company Emergency Contacts, and;
- Locations of Spill Containment Equipment and PPE.

Identification of an emergency will be broadcast via the 2-way radio system. In the event of an emergency dial 911. To familiarize emergency services with the facility layout, rally points, and evacuation procedures, a practice drill or walk through will be conducted with local emergency services. This will enable more efficient routing of emergency personnel to various areas of the site, familiarize emergency personnel with site critical points of contact, and enhance response time.

Encycle/Texas Inc. operations ceased in 2003. The facility was shut down and vacated in 2005 due to bankruptcy, and as a result power to the facility has been disconnected. The facility is currently undergoing asbestos abatement, removal of remaining hazardous wastes, and building and structure demolition. In the event of an emergency situation (fire, chemical release, etc) as a result of the demolition related activities that may impact the nearby Dona Park neighborhood or industrial facilities, project management will implement the following emergency response procedures:

- Contact Local Emergency Planning Committee (LEPC) at 361-826-3960 or 361-880-3960. Project management will provide the LEPC team pertinent information regarding the type, location, and severity of the situation. The public may then call 826-INFO (4636) to find out more information during a significant emergency.
- Contact Texas Commission on Environmental Quality (TCEQ) Region 14 office in Corpus Christi at 361-825-3100. The project team will report the emergency to the TCEQ Region 14 to assist in a

coordinated response as well as to provide another point of contact for information regarding the event.

- Contact the local fire department and police department -911. Emergency services will be contacted to coordinate response efforts.
- Public evacuation orders will be managed and coordinated by project management, law enforcement, and the civil emergency communication system.