

Husky Refinery – Superior, Wisconsin

Asbestos Removal Work Plan Partial Removal Prior to De-Inventory

*06/14/2018
Revision 0*



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INTRODUCTION

This document serves as the area cleanup work plan (Plan) associated with the safe removal of confirmed and/or presumed asbestos-containing materials at the Husky Refinery in Superior, Wisconsin (Plant). In April of 2018, an explosion ruptured a process vessel, causing an uncontrolled release of tar from an onsite aboveground storage tank. This led to areas of assumed cross-contaminating with asbestos-containing insulating materials in various areas of the Plant.

Work associated with this Plan is anticipated to be completed for the south crude unit. As work progresses and additional units are evaluated, this Plan may be applied to other units within the Plant that have been impacted from the event in April of 2018.

With the dynamic of operations at the Plant changing on a frequent basis, this plant is subject to revision at any time, contingent on the direction of Husky representatives.

1.0 PERSONNEL

All applicable asbestos-related work associated with this Plan will be conducted by trained and accredited individuals employed by Brandenburg. Brandenburg will be the sole occupant of the unit(s) once work areas are established, unless expressly agreed upon by the Brandenburg site competent person.

2.0 SETUP

Brandenburg will establish a regulated area around the designated area of the operating unit subject to this Plan; this will be achieved by installing a reinforced polyethylene curtain at the exterior of the unit. This curtain may be established by suspending from sound existing utilities at the perimeter of the unit, or by an erected scaffolding system - scaffolding installation may be assisted by Husky. Signage will be posted outside of the curtain in accordance with 29 CFR 1926.1101 and State of Wisconsin regulations. A decontamination facility will be installed adjacent to the regulated area equipped with an equipment room, shower facility, and clean room. Temporary utilities in order to operate the decontamination facility (i.e. potable water, electricity) will be supplied by Husky.

Brandenburg and Husky representatives will then review specific areas where Husky will need to access in order to properly de-inventory the affected units subject to removal. These areas will be documented, along with field-marking if accessible. Once this has been completed, Brandenburg will evaluate current area conditions and review with Husky representatives; if needed, additional controls such as shoring will be established by Husky for safe entry and egress within the unit(s) prior to the commencement of Brandenburg's work.

3.0 PPE / AIR MONITORING

After regulated areas are established, Brandenburg employees will don PPE in accordance with Class I work methods as prescribed by 29 CFR 1926.1101. This includes disposable whole-body clothing, head coverings, gloves, and foot coverings, along with respiratory protection. At the initiation of removal activities, Brandenburg employees will don Powered Air Purifying Respirators (PAPRs) until representative personal air monitoring is available to establish a negative exposure assessment pursuant to OSHA requirements. Once this exposure assessment can be completed, workers will don either half face or full face respiratory protection for the remainder of asbestos-related activities.

Area and personal air monitoring will continue to be conducted by Husky representatives during all asbestos-related work activities.

4.0 PRE-CLEANING

Brandenburg will enter the unit and begin pre-cleaning of the assumed asbestos-containing tar present at grade level. Removal will be completed by a combination of hand labor and heavy machinery – wet work methods will be established as applicable, along with prompt containerization into leak-tight containers for final disposition by Husky.

5.0 PARTIAL REMOVAL

Brandenburg will establish gross wet methods over the work area; this may include application by a combination of water hoses, articulating mobile misters (“Dust Boss”), and amended water applications. Water will be applied in a manner to sufficiently wet the insulating materials on piping, vessels, tanks, etc. within the work area while minimizing runoff to adjacent areas – controls will be established as needed, i.e. temporary berms, vacuuming of water, etc. to assist in containing runoff. Once materials have been adequately wet, Brandenburg will selectively remove gross accumulations and insulating materials as needed within the direct vicinity of access needed by Husky for the de-inventory. Final cleaning of the surfaces will be completed via HEPA vacuuming, wet-wiping, and/or final rinsing with amended water, followed by a final encapsulate application to equipment surfaces within the decontaminated area.

After removal and final cleaning, Brandenburg will review the areas with Husky representatives to verify all known or presumed asbestos-containing materials within Husky’s established de-inventory limits have been removed – this verification will be documented and signed by the Brandenburg site competent person and Husky representative – see Attachment 1 for further details.

Brandenburg will demarcate ingress/egress routes (via barrier tape) for Husky Plant Personnel to access process lines to accomplish their de-inventorying processes. Final air clearance monitoring performed by others; will verify compliance with Section 2.1 of the 2018 Superior Refinery Fire Asbestos Removal Plan.

6.0 DE-INVENTORY

Husky will enter the decontaminated area for the de-inventory process. Once completed, Husky will review the de-inventory and completed utility isolation process with Brandenburg site competent person. This review and verification will be documented on Brandenburg Form SAF-06 – see Attachment 2 for further details.

7.0 FULL REMOVAL

Brandenburg will exclusively occupy the unit and perform full removal of any remaining confirmed or presumed asbestos-containing materials. Gross wet methods will be established over the work area; this may include application by a combination of water hoses, articulating mobile misters (“Dust Boss”), and amended water applications. Water will be applied in a manner to sufficiently wet the insulating materials on piping, vessels, tanks, etc. within the work area while minimizing runoff to adjacent areas – controls will be established as needed, i.e. temporary berms, vacuuming of water, etc. to assist in containing runoff. Once materials have been adequately wet, Brandenburg will remove the remaining gross accumulations and insulating materials. If safely accessible and as determined by the Brandenburg site competent person, glove-bagging procedures and/or “wrap-and-cut” methods may be used in areas as feasible. Wet work methods and prompt containerization into leak-tight containers for final disposition by Husky will be conducted throughout the removal process – wastes will be containerized as generated. Final cleaning of the surfaces will be completed via HEPA vacuuming, wet-wiping, and/or final rinsing with amended water, followed by the application of an encapsulate. Husky representatives will then complete final air clearance monitoring to verify compliance with Section 2.1 of the 2018 Superior Refinery Fire Asbestos Removal Plan.

8.0 DEMOLITION

Once confirmed and/or presumed asbestos-containing materials have been removed from the unit, Brandenburg and Husky will evaluate areas of the unit subject to demolition. If items within the unit are desired to be salvaged, Husky representatives will review with Brandenburg prior to demolition the exact items and conditions desired for the items prior to disturbance. Due to the current conditions of areas of the Plant, Brandenburg cannot guarantee items to be salvaged, but will make the best concerted effort to remove in a manner consistent with Husky expectations. Brandenburg will be the sole occupant of the established work area prior to commencement of demolition. Demolition activities will be completed by a combination of hand labor and heavy machinery. Upon completion, Brandenburg will leave the site in a neat and clean condition in accordance with Husky expectations and turn over Care, Custody, and Control of that area back to the Owner.

*ATTACHMENT 1:
FIELD REPORT MEMO FOR TRANSFER
OF AREA TO DE-INVENTORY*

Brandenburg®

Completion Memo

Customer Name: Husky - Superior Refining Company Date: _____
Project: IL1969

This field report serves as the completion notification for the above referenced area. Your acceptance of the area conditions as of this date completes our obligations for removing visually presumed gross accumulations of asbestos containing material per your direction and releases Brandenburg Industrial Service Company from any liability of the remaining area conditions. As a result of this completion, Brandenburg Industrial Service Company is transferring Care, Custody and Control of the Site and its conditions back to the Owner for decommissioning.

CUSTOMER
PRINT NAME

CUSTOMER
SIGN NAME

BRANDENBURG
PRINT NAME

BRANDENBURG
SIGN NAME

*ATTACHMENT 2:
SAF-06 – UTILITY VERIFICATION FORM*

Utility Verification

Project Cd: IL1969

Date: _____

Site DIG/JULIE/Locate # _____

Expiration _____ **set reminder to renew each month*

Name of Area / Building / Structure: _____
(EACH AREA / BUILDING / STRUCTURE REQUIRES AN INDIVIDUAL VERIFICATION FORM)

Utility List: Identify the utilities that are present and have been verified as de-energized, air gapped and/or locked out and made safe. Add any additional utilities, equipment or process lines if needed. If a utility is not present, indicate not applicable (NA). This form must be completely filled out and signed by all parties before work can begin.

	Date	Verified	Non-Applicable	Comments
Domestic Water	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Electrical	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Fiber Optic	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Fire Protection	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Natural Gas	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Process Chemical Lines**	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
<i>** (drill low points as necessary)</i>				
Process Gas Lines	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Sewer/Sanitary	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Steam	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Telephone	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Other Equipment (HVAC, Fire Alarm, etc.)	_____	<input type="checkbox"/>	<input type="checkbox"/>	_____

List the Utilities that will remain active during this work and the protection(s) in place:

By signing below the following persons confirm that they have physically verified all the above utilities have been de-energized, air gapped and/or locked out and otherwise made safe for work.

Owner Representative:

Signature:

Brandenburg Competent Person:

Signature:
