

Asbestos Code of Practice

1.0 Purpose

The purpose of the Asbestos Code of Practice (COP) is to fulfil regulatory requirements for asbestos and to provide Cenovus with operational guidance for controlling asbestos exposure levels to as low as reasonably achievable and below permissible limits at all times.

2.0 Scope/Application

This COP applies to all Cenovus worksites and encompasses all Cenovus work activities. Contractors working at Cenovus worksites where asbestos may be encountered are expected to have their own asbestos program in place.

3.0 Asbestos Requirements

3.1 Asbestos Hazard Assessment and Control

Asbestos materials are generally common on buildings and equipment at facilities manufactured before 1980; however, asbestos can be found in low friability products such as gaskets and cement boards manufactured into the 1990's. Identification of asbestos requires laboratory analysis of bulk samples. In general, a material is considered to contain asbestos if it contains 1% or greater asbestos content by weight.

Asbestos represents a health concern when it is inhaled. The presence of asbestos in materials is an acceptable condition; however, it does present risks if the material is not properly identified and managed.

To properly assess the risk of exposure, a variety of factors are included such as:

- a) Asbestos content,
- b) Friability (ability to break apart and become airborne),
- c) Condition of the material, and
- d) Accessibility.

Wherever asbestos is suspected at a Cenovus facility, an asbestos exposure risk assessment will be conducted by qualified health and safety personnel trained and experienced in asbestos. If asbestos is confirmed at a facility, an Asbestos Management Program will be developed and implemented, consisting of the following elements:

- a) Inventory of asbestos-containing materials (ACM).
- b) Asbestos processes that workers are allowed to undertake,
- c) Emergency procedures in case of damage or an uncontrolled release of asbestos fibres.
- d) Procedures to follow if changes occur to either the condition of material or risk of exposure.
- e) Annual inspection of ACM, following appropriate procedures.

- f) Training requirements for personnel who conduct inspections, or who may come into contact with asbestos-containing material.
- g) Notification procedures for government, site workers, and contractors.
- h) Labelling and signage for asbestos, as per the Workplace Hazardous Materials Information System (WHMIS) requirements.
- i) A written exposure control plan for reference by workers.

All materials that may contain asbestos will be disturbed as little as reasonably possible to prevent asbestos release to the environment and worker exposure. As part of the exposure control plan, procedures will be developed to ensure that accidental asbestos releases and exposures are minimized using methods appropriate to site-specific situations.

The exposure control plan and disposal procedures will be specified in the site-specific Asbestos Management Program.

3.2 Regulatory Notification and Approval

In Alberta, notification must be given to the Workplace Health and Safety province-wide Contact Centre (1-866-415-8690) at least 72 hours before starting any work involving the disturbance of asbestos and has the potential to release airborne fibres from ACM in which workers may be exposed.

This notification must include the location of the worksite, the start and completion dates, and a description of the work to be performed. An "Asbestos Project Notification Form" (Form ASB001) must be completed and submitted to Workplace Health and Safety. Receipt of the form will be acknowledged with an Asbestos Project Notification Acknowledgement Form.

In Saskatchewan, notification of a high-risk asbestos project must be provided to Saskatchewan Labour (1-800-567-7233) at least 14 days prior to the start of the project. The "Notification of High-Risk Asbestos Process" (Form 28378) is available at their website.

3.3 Occupational Exposure Limits (OELs)

	8-Hour (OEL)
Cenovus OEL	0.1 fibres/cubic centimetre (f/cc)
Alberta	0.1 fibres/cubic centimetre (f/cc)
Saskatchewan	*
ACGIH TLV **	0.1 f/cc

*Asbestos is a designated substance listed in Table 20 of the Saskatchewan Occupational Health and Safety Regulations. No exposure limit is specified. However, Section 306 requires that an employer shall: "(a) provide adequate engineering controls to prevent, to the extent that is reasonably practicable, the release of the substance into the place of employment; and (b) take other measures and provide personal protective equipment that meet the requirements of Part VII to prevent, to the extent that is practicable, any significant risk to workers from the substance."

**ACGIH TLV: recommended limit only – no regulatory significance.

3.4 Pre-Job Hazard Assessment, Safety Meeting and Safe Work Permit

All asbestos removal regardless of the quantity or location requires a pre-job hazard assessment, a safety meeting, and a Safe Work Permit (SWP).

Important Note: All affected workers (i.e., the work crew) must be included in the pre-job hazard assessment and in the control or elimination of those identified hazards. Further, all other workers at the worksite or at other worksites affected by the work or hazards identified in the hazard assessment and SWP must be informed of the hazards and of the methods used to control or eliminate the hazards.

4.0 Training

All employees who may be required to work in areas where ACM is present must be familiar with this COP, site-specific asbestos management procedures, and have asbestos awareness and WHMIS training.

Contractors must also have asbestos and WHMIS training. Cenovus will inform contractors of the location of all ACM. This may be accomplished through a combination of identification/labelling of process lines/tanks/vessels and on-the-job training.

5.0 Documentation

Results of asbestos sampling and exposure measurements will be maintained for the life of the facility.

6.0 Roles and Responsibilities

Roles and responsibilities for safety documents are described in the link below:

Cenovus CEN_EHS234, Roles and Responsibilities Standard

Roles and responsibilities specific to this Asbestos Code of Practice are described below:

6.1 Business Unit/Site Leadership

Business Unit and Site Leaders are responsible for hiring contractors permitted to sample or remove asbestos. It is recommended that any asbestos-removal projects be discussed with the Cenovus Industrial Hygienist.

6.2 Cenovus Worksite Supervisors

Worksite Supervisors are responsible for:

- a) Knowing the location of asbestos-containing materials (ACM) in the workplace and ensuring that they are properly marked with labels or signage.
- b) Immediately reporting the accidental release of ACM to their Supervisor (filing an incident report), and avoiding disturbance of ACM.

6.3 Workers and Contractors

All workers are responsible for:

- a) Reporting damaged ACM or missing asbestos warning signage to their Supervisor.
- b) Knowing how ACM is labelled.
- c) Reporting to their Supervisor the accidental release of ACM, and stopping work if necessary.

7.0 Governing and Reference Documents

7.1 Internal Governance

Document Type	Governance Documents
Policy	Corporate Responsibility Policy
Framework	Cenovus Operations Management System (COMS)
Policy	Enterprise Risk Management Policy
Regulatory	Alberta OHS Code (2009) – Part 4 and Schedule 1 Tables 1 & 2
Regulatory	Saskatchewan OHS Regulation – Part XXIII and Table 5

7.2 Internal References

Document Ref. #	Internal Reference Documents
CEN-EHS019	Hazard Assessment and Control Practice
CEN-EHS022	EH&S/Operations Risk Management Practice
CEN-EHS146	Occupational Health Risk Assessment Practice
CEN-EHS010	Respiratory Protection Code of Practice

7.3 External References

Document Origin	External Reference Documents
Work Safe Alberta	Asbestos at the Work Site
Work Safe Alberta	Asbestos Containing Material in Buildings to be Demolished
Work Safe Alberta	Asbestos Project Notification Form
Work Safe Alberta	Asbestos Abatement Manual

8.0 Change Management

Proposed changes to this standard can be directed to H&S Programs & Projects

9.0 Definitions and Acronyms

Definitions and acronyms for safety documents are described in the link below:

Cenovus CEN_EHS243, Definitions and Acronyms

The following definitions and acronyms are specific to this code of practice.

Asbestos means the fibrous form of crocidolite, amosite, chrysotile, anthophyllite, actinolite, tremolite, or a mixture containing any of those minerals.

ACM means asbestos-containing materials

Asbestos dust means dust that consists of or contains asbestos fibres that are likely to become airborne.

Asbestos process means any activity that may release asbestos dust and includes:

- a) The sawing, cutting, or sanding of asbestos-containing materials,

- b) The repair, maintenance, replacement, or removal of asbestos surfaces,
- c) The cleaning or disposal of asbestos materials,
- d) The mixing or application of asbestos shorts, cements, grouts, putties or similar compounds,
- e) The storing or conveyance of materials containing asbestos, and
- f) The demolition of structures containing asbestos.

Asbestos surface means the surface of an object that contains asbestos.

Friable means material that, when dry, is or can be crumbled, pulverized or powdered by hand pressure.