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WELDON SPRING SITE REMEDIAL ACTION PROJECT
MK-FERGUSON CO., INC. WO 3589 (314) 441-8086
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SUBJECT Quarry Asbestos Removal and Storage

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INITIATE ACTION ITEM

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ACTION REQUIRED _____

DUE DATE / / ACTION ITEM LOG NUMBER _____

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Mr. Dan Wall
Remedial Project Manager
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Wall:

QUARRY ASBESTOS REMOVAL AND STORAGE

During the excavation and removal of the bulk waste from the quarry at the Weldon Spring Site Remedial Action Project, we expect to encounter asbestos and/or asbestos-containing material (ACM) in varying amounts and sizes. The Department of Energy wishes to clarify quarry asbestos removal operations under the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations.

The Record of Decision for the Management of the Bulk Wastes at the Weldon Spring Quarry (QY ROD) states that the NESHAP requirements for asbestos (40CFR 61, Subpart M) are "applicable for all phases of the action" (removal, transfer, and storage). Due to the nature of the operation and type of ACM to be found, we believe that some phases of the "asbestos removal" may not fully comply with the NESHAP requirement since full compliance may generate increased worker safety risks.

The NESHAP requirement states that no visible emissions may be discharged to the outside air during collection, processing, packaging, transporting, or deposition of any asbestos-containing waste material. The regulation further requires that the asbestos-containing waste material be mixed with water or other wetting agents and sealed in labeled, leak-tight containers while wet.

Any asbestos found in the quarry during excavation is expected to be mixed with other debris and soil. Segregating the asbestos may be difficult to accomplish depending on the condition and size of the material. The asbestos will be separated from other equipment or debris if it can be handled by conventional excavation equipment and measures larger than 2'x 2'x 2" (i.e., about one cubic foot in size). The larger pieces of asbestos will be wetted and placed in nearby roll-off containers and covered (and tightly sealed). The roll-offs will then be transferred to the Temporary Storage Area (TSA). These containers will meet EPA requirements for ACM waste containers.

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Smaller pieces of asbestos will not be segregated because of the inherent worker safety risks and exposures that would be involved during the tedious hand labor required for removal. The smaller pieces of asbestos, which will be mixed with soil and debris, will be transported in covered trucks to the TSA. Debris piles at the TSA will be covered or sprayed with foam, roped off, and designated as an asbestos storage area. Any asbestos in these piles will not be sealed in leak-tight containers as required under NESHAPS.

This method of collection, transfer, and storage will still protect health and the environment as required under Section 121. The workers involved in the removal of the bulk waste will be wearing respirators that will filter out any asbestos fibers. In addition, environmental air sampling will be conducted in order to verify adequate excavation, transportation, and storage procedures for asbestos contaminated debris and soil.

The DOE plans to proceed with the asbestos removal and storage methods as explained above. We believe that an ARAR waiver may not be required since the proposed activity does not affect final cleanup criteria or impact the ability to protect health and the environment. I have enclosed for your use position/interpretation summary.

If you have any questions, please contact Alan D. Gibson at (314)441-8978.

Sincerely,

Stephen H. McCracken
Project Manager
Weldon Spring Site
Remedial Action Project

Enclosure:
As stated

cc w/enclosure:
Mary Gilbert, PMC
Dave Bedan, MDNR

EW-94:AGibson:x850:emh:3/19/92 (m:QuarAss.let)

CONCURRENCES

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EW-94	AGibson	3/19/92
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