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WELDON SPRING SITE REMEDIAL ACTION PROJECT
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St. Charles, MO 63303

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SUBJECT Request for GRAP Waiver of NESHAP Requirements for Quarry (Asbestos) Removal

Originators DCN:

AUTHOR McCracken, S.H. TO Wall, Dwa DATE 7/23/92

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REFERENCED DOCUMENT(S)

THIS IS A RESPONSE TO COMMUNICATION: NUMBER DATED

ACTION ITEM TRACKING

INITIATE ACTION ITEM

INDIVIDUAL ASSIGNED TO ACTION DEPARTMENT

ACTION REQUIRED

DUE DATE / / ACTION ITEM LOG NUMBER

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY?

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JUL 23 1992

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

Dear Mr. Wall:

REQUEST FOR ARAR WAIVER OF NESHAP REQUIREMENT FOR QUARRY ASBESTOS REMOVAL

In response to our meeting with you and the State of Missouri on June 10, 1992, we have further evaluated the issue of asbestos removal during quarry bulk waste operations. We do not believe that compliance with certain requirements of 40 CFR Part 61, Subpart M, would be safe or technically feasible and hereby request a waiver from the requirements as specified below.

During bulk waste removal it is anticipated that small quantities of friable asbestos will be encountered. It is expected that this material will be wet and covered with mud, dirt, and other debris. The WSSRAP proposes to remove the large pieces of asbestos by hand and place it in appropriate bags. The bags will then be placed in wind-tight and leak-tight metal boxes which will be transported to the asbestos storage area at the chemical plant.

WSSRAP personnel would not sift through the bulk waste to remove every small piece of asbestos because of inherent dangers associated with working in close proximity to the bulk waste. The bulk waste contains various radioactive elements, nitroaromatics, and many drums and other containers with unknown contents. The hand labor required to remove the small pieces of asbestos could be very hazardous to the laborers. In addition, it is not technically feasible to remove all of the asbestos from the soil and debris.

Therefore, the WSSRAP plans to leave the small pieces of asbestos in the bulk waste, keep it wet, and handle it with the fine-grained soils. This material would be transported to the temporary storage area (TSA) in leak-proof, covered

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trucks and placed in the fine-grained soils pile. Soil and rubble piles at the TSA which contain asbestos will be covered or sprayed with a foam which provides a wind-tight seal, thereby allowing no visible emissions. Following relocation of bulk waste, and until final remediation of the site, a longer-term cover will be installed.

This storage plan does not meet all of the NESHAP requirements since the small pieces of asbestos would not be bagged or placed in leak-tight containers.

The Record of Decision for the Management of the Bulk Wastes at the Weldon Spring Quarry states that the NESHAP requirements for asbestos (40 CFR 61, Subpart M) are "applicable for all phases of the action" (removal, transfer, and storage). Full compliance with the NESHAP requirement for asbestos removal would require workers to sift through soil and debris in potentially dangerous, unstable areas to pick out any small pieces of asbestos, thereby exposing workers to greater doses of radioactivity and potential chemical hazards. Full compliance with the NESHAP requirement would result in greater risk to the health of the workers than the alternative described above.

Under Section 121(D)(4) of CERCLA, an ARAR waiver may be invoked if compliance with the ARAR would "result in greater risk to human health and the environment than alternative options." The DOE hereby requests that a waiver to the NESHAP requirement be approved for this portion of the asbestos removal.

We see no technically feasible alternatives to this plan and believe it provides greater protection to the project workers and the public.

Sincerely,

ORIGINAL SIGNED BY
STEPHEN H. McCRACKEN

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

CC: Dave Bedan, MDNR
Mary Gilbert, PMC

EW-94:AGibson:x7027:emh:7/22/92 (m:NESHAPS)

CONCURRENCES

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EW-94	AGibson	7/22/92
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