

DOCUMENT CONTROL SYSTEM - CORRESPONDENCE FILE

WELDON SPRING SITE REMEDIAL ACTION PROJECT
 MK-FERGUSON CO., INC. WO 3589 (314) 441-8086
 7295 Highway 94 South
 St. Charles, MO 63303

Document Number: _____
 Document Type: LR DOEW-EPA

Originators DCN: _____
 SUBJECT: Request for GRAP Univeral NECHAP Requirements
for Clearly Unsettled Remedial
 AUTHOR: McCracken, S.H. TO: Wall, Dan DATE: 7/23/92
 SUBJECT CODE/WORK PACKAGE NUMBER: 0306aD

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 11 ACTION ITEM LOG NUMBER _____
 IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY? _____
 CLOSE ACTION ITEM
 IS THIS A RESPONSE TO AN ACTION ITEM? NO _____ YES _____
 ACTION ITEM LOG NUMBER _____ CLOSING DOCUMENT DIN _____
 COMPLETION DATE _____ APPROVAL _____

COMMENTS _____

DISTRIBUTION	ATTACH W/W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	ATTACH W/W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	W/W/O
J.R. Powers			H.R. Lewis			DOE	
R.R. Tucker			C.C. Reith			S.H. McCracken	
D.S. Steffen			J.E. Williams			J.S. Vanfossen	
H.R. Antram						G.A. Newton	
C.R. Bowers						V.K. Love	
J.A. Cooney						J.E. Enright	
R.B. Ferguson						K.D. Lauer	
S.V. Green						A. Gibson	
K.M. Greenwell						J.M. Richmond	
P.D. Cote			Reading Pile			H.D. Bellow	
K.D. Jenkins			Admin. Record			S. Richardson	
J.S. McKee			Tech Editor				
H.S. Bolton							
F.S. Barton			ORIGINATOR:			DOCUMENT CONTROL	X

Dan Wall

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:AOIbaonix7027ismh17/22/92 (MINEBHAPB)

CONCURRENCES

RTG SYMBOL
EW-94

INITIALS/SIG
AGIB

DATE
7/22/92

RTG SYMBOL
EW-94

INITIALS/SIG
JVanFossen

DATE
7/1/92

RTG SYMBOL
EW-94

INITIALS/SIG
SMcCracken

DATE
7/21/92

RTG SYMBOL

INITIALS/SIG

DATE

RTG SYMBOL

INITIALS/SIG

DATE

RTG SYMBOL

INITIALS/SIG

DATE

RTG SYMBOL

INITIALS/SIG

DATE