

3604

**REVISED SECTION 1 OF RA #26 COMPENDIUM
(REPLACE SECTION 1 OF THE ORIGINAL
SUBMITTAL WITH THIS REVISION)**

08-10-92

DOE/EPA

20

ATTACHMENT

3604

ATTACHMENT II

Revised Section I of RA #26 Compendium
(Replace Section I of the original
submittal with this revision)

INDEX

SECTION I ASBESTOS ABATEMENT PROGRAM OVERVIEW

- Introduction
- Background
- Program Description
- Integration with OU3 RI/FS
- Figure 1, Asbestos Control Policy
- Figure 2, Logic Flow Chart for Asbestos Program
- Figure 3, FEMP Document Hierarchy
- Table I, Summary Description of General and Implementing Procedures
- List of Acronyms

SECTION II GENERAL SUPPORTING DOCUMENTATION

- IN-FMPC-6007, Site Documentation System
- SSOP-0023, Deviation and Corrective Action Reporting
- RM-FMPC-0002, Centralized Training Program Manual*
- FMPC-2139, FMPC Quality Assurance Plan*
- FMPC Site Health and Safety Plan*
- PO-1003, Asbestos Control Policy
- CH-2005, Asbestos Management Committee Charter
- FMPC-2152, FMPC Respiratory Protection Manual
- FMPC-0519, Management of Hazardous Waste
- FMPC 2084, FEMP Radiation Control Manual
- FMPC-505, Radiation Control

ASBESTOS ABATEMENT REMOVAL ACTION

p. 2

INDEX

SECTION III IMPLEMENTING PROCEDURES

- Step 1 Identification of ACM
- PL-FMPC-3002, Asbestos Management Plan
 - Asbestos Survey & Assessment for the FEMP*
- Step 2 Characterize ACM
- IH-03, Control of Work Involving Asbestos
 - PL-FMPC-3002, Asbestos Management Plan
 - Asbestos Survey & Assessment for the FEMP*
- Step 3 Determine appropriate abatement
- SOP-FMPC-0518, Completion of NEPA Documentation
 - PL-FMPC-3002, Asbestos Management Plan
 - OU3 RI/FS Work Plan Addendum*
 - Asbestos Survey & Assessment for the FEMP*
- Step 4a Agency notification and documentation
- RCG-90-100, Notification Procedures
 - SOP-FMPC-0518, Completion of NEPA Documentation
- Step 4b In situ Maintenance for Operations and Maintenance (O&M)
- IN-6029, Asbestos Operations & Maintenance Manual
 - FMPC-0516, Control of Permits for Accomplishing Hazardous Work
 - SP-P-41-006, Issuing Permits for Asbestos Work
- Step 5 Removal
- 20-C-604, Control and Utilization of Contaminated Trash Dumpsters
 - IH-03, Control of Work Involving Asbestos

INDEX

- FMPC-0516, Control of Permits for Accomplishing Hazardous Work
 - SP-P-41-006, Issuing Permits for Asbestos Work
 - IN-6029, Asbestos Operations & Maintenance Manual
- Step 6 Waste Management Program
- PP-0134, Packaging, On-Site Movement and Off-Site Shipment of Material
 - Low Level Waste Management Procedures**
- Step 7 Ongoing Hazard Assessments
- DOE Order 5480.10, "Industrial Hygiene Program"
 - FMPC 2128, IH&S Manual*
 - IH-03, Control of Work Involving Asbestos
- Step 8 Long Term Plans (RI/FS; Safe Shutdown, RA #12)
- FEMP Asbestos Abatement Plans
 - Safe Shutdown Work Plan**
 - Asbestos Survey & Assessment for the FEMP*
 - OU3 RI/FS Work Plan Addendum*
 - Study for Systematic Removal of Buildings and Facilities*
 - Work Plan for Plant 7 Dismantling*
 - RI Report/Baseline Risk Assessment*
 - FS Report/Proposed Plan*
- Step 9 Self-Assessment and Program Evaluation
- Asbestos Program Internal Audit/Self-Assessment System
 - DOE Self-Assessment Guidance Document

ASBESTOS ABATEMENT REMOVAL ACTION

INDEX

- Step 10 Training and Corrective Action Implementation/Communication
- Asbestos Program Training Matrix

* To be transmitted to USEPA as part of a future Consent Agreement deliverable or upon request.

** Previously transmitted as part of some other Removal Action documentation

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Introduction

In September 1991, the U. S. EPA (USEPA), and the U. S. Department of Energy (DOE) jointly signed an amended Consent Agreement pertaining to the Fernald Environmental Management Project (FEMP), formerly known as the Feed Materials Production Center (FMPC). Consistent with the terms of this amended Agreement, on January 15, 1992, a listing of potential new removal actions (termed Phase III) was submitted to the USEPA by USDOE for review and approval. This listing of potential new removal actions was subsequently approved by the USEPA at the February 25, 1992, Program Managers Meeting. One of these removal actions identified that activities performed under the scope of the current-ongoing FEMP Asbestos Program would constitute a Removal Action consistent with Section IX.F.2 of the Consent Agreement and the provisions of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Asbestos Program was designated a Removal Action based on extensive knowledge of asbestos hazards at the FEMP, concern for the workers involved in removal or remedial action, and a recognized need to continue abatement activity as part of an ongoing program supporting the OU3 RI/FS. This Asbestos Removal Program-Removal Action is designated as number twenty-six (26), termed "Asbestos Removals (Asbestos Program)".

The January 15, 1992, Phase III submittal established that the DOE would submit asbestos work procedures consisting of a compendium of existing procedures and documentation for the ongoing Asbestos Abatement Program. This deliverable has been compiled to fulfill the terms of the agreement for Removal Action No. 26 that was submitted to USEPA on May 19, 1992.

This submittal provides a brief overview of the FEMP Asbestos Program and a review of the policies and procedures governing the program. The purpose of this submittal is to transmit to the USEPA a compilation of FEMP facility documentation supporting the FEMP Asbestos Program, while providing an overview of the scope and objectives of the Removal Action. The Removal Site Evaluation (RSE) associated with RA #26 includes a discussion of the nature and extent of the asbestos hazards on site, and provides additional background to the designation of Asbestos Program activity as a Removal Action.

Background

The FMPC was built in the early 1950's to provide high purity uranium metal and other forms to support U.S. defense initiatives. The name of the facility was changed to the FEMP in 1991 after production ceased in 1989 and the site mission changed from metals production to environmental remediation. During construction of the facility and throughout the production phase of operations, asbestos materials were used as building materials (building siding, floor tiles, ceiling tiles, etc.) and as process support materials for producing uranium and by-products (insulations, liners, etc.). Some of the asbestos

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Background (con't)

materials have become radiologically contaminated as a consequence of 37 years of production process operations. Asbestos has been identified as posing a potential health hazard and environmental contamination problem from migration induced through weathering, and the human exposures resulting from the increased potential for contact with personnel performing environmental remediation. This problem is present across the FEMP due to the extensive quantities, condition, and ubiquitous nature of asbestos and asbestos containing material (ACM).

This removal action will address the comprehensive plan for asbestos abatement at the FEMP. The ongoing and planned activities comprising this Removal Action are expected to be consistent with the final remedy identified from the Remedial Investigation/Feasibility Study (RI/FS) process. The primary regulatory drivers for Program activities are OSHA (29 CFR 1926.58), U.S. EPA NESHAP (40 CFR 61 Subpart M) and OEPA (OAC 3745-20) regulations.

As a result of concern for potential exposures to site workers and releases to the environment due to the nature and condition of the ACM, an Asbestos Abatement Program was established at the FEMP. A trained dedicated crew of Asbestos Abatement workers was formed in 1990 and an Asbestos Program Coordinator was hired to provide inter-department daily oversight of site activities involving ACM. As the site completely shifted its focus to environmental remediation, a centralized Asbestos Management Committee was organized to ensure line management involvement across departments.

3604

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Asbestos Program

The FEMP Asbestos Program is a comprehensive program that is intended to provide management oversight for all support activities that involve asbestos containing material (ACM) or are conducted in areas where ACM is located. The Program is defined by an evolving Asbestos Management Plan that enacts an Asbestos Control Policy (see Figure 1) focusing on worker protection, prevention of environmental emissions and compliance with the applicable regulations or legal agreements. An Asbestos Management Committee (AMC), representing the principal FEMP organizations involved in abatement activities, ensures the principles expressed in the Control Policy are established by developing sitewide procedures, setting specific abatement and management goals, periodically evaluating progress towards these goals, and communicating corrective activities or general information to their respective organizations. Many of the AMC members are State of Ohio certified Asbestos Hazard Evaluation Specialists and Asbestos Hazard Abatement Specialists (AHAS), trained to ensure the Asbestos Program meets the requirements in OSHA 1926.58, OSHA 1910.120, CAA NESHAP subpart M, OAC 3745-20, DOE Orders, legal agreements and all the CERCLA regulations associated with the FEMP cleanup.

The Asbestos Program Coordinator is the chairman of the Asbestos Management Committee and reports to the Manager of the WEMCO Clean Air Program (CAP). The CAP is managed within the Clean Air and Water Programs section of the WEMCO Environmental Management Dept., to ensure that the program is ultimately managed as part of a CERCLA, multimedia (air, water, soil) environmental restoration of the FEMP.

Figure 2 is a logic flowsheet identifying the elements that comprise the Asbestos Program from identification of the hazardous material to final disposition of the removed ACM waste (covered as part of the Removal of Waste Inventories Removal Action #9). As illustrated in the FEMP Document Hierarchy (Figure 3), the various elements that comprise the Program are executed by describing the requirements (DOE Orders, Laws and Regulations, et al.) in Policy and Directives that are enacted through Sitewide and Department documents. Table I summarizes all the directives, policies, plans and procedures that constitute the site guidance documents. A step by step review of Figure 2, its relationship with the FEMP Document Hierarchy and the current site documents, best illustrates how the Program is directed to meet all the requirements.

3604

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Asbestos Program (con't)

Step 1 - Identification of Asbestos Containing Material (ACM)

As Step 1 of Figure 2 indicates, the first element of the Program involves identification of the ACM at the FEMP. A site survey was recently completed by certified Asbestos Hazard Evaluation Specialists (AHES) who were contracted to do an Asbestos Hazard Evaluation and Response Act (AHERA) based survey of the entire site. Certified Asbestos Hazard Evaluation Specialists from the site oversaw the surveyors, and validated every aspect of the survey to ensure the sampling, analysis, labeling and disposition of the sampled material met the AHERA, OSHA and CAA requirements.

As described in Table I, the current Asbestos Management Plan is the document describing how the survey was performed, and the Asbestos Survey & Assessment report summarizes 3000 pages of detailed information from the evaluation of 74 buildings. Over 2,500,000 sq. ft. of asbestos transite, 120,000 linear ft. of asbestos insulation and 32,000 sq. ft. of miscellaneous ACM (tile, etc.) have been identified in 56 buildings on site. The Site Survey is part of the supporting documentation in the Administrative Record for Operable Unit (OU) 3, and was transmitted to the DOE Fernald Office, February 28, 1992.

Step 2 - Characterization of the ACM

The original Asbestos Management Plan (AMP) also provided for a two step characterization of the ACM, utilizing the AHERA hazard ranking, and the Air Force "grade" algorithm to assess the condition and potential for disturbance of the material. Each homogeneous area was numerically prioritized to categorize the material for in situ maintenance or removal. The survey is kept current through ongoing site hazard assessments (Step 7) performed by certified AHES and Industrial Hygiene technicians. Facility reinspections are also conducted annually in the presence of certified AHES, and the survey records are updated by OSHA competent Clean Air Program (CAP) personnel to reflect progress in ongoing asbestos abatement projects.

In addition to the Asbestos Management Plan, the "Control of Work Involving Asbestos" document and the Industrial Hygiene & Safety Manual provide guidance during any of the work required to characterize the ACM.

Step 3 - Determining the Appropriate Abatement

The Step 3 determination of appropriate abatement is a process that involves a comprehensive evaluation of the hazards of the ACM and the other CERCLA hazardous substances within the particular facility. The National Environmental Policy Act (NEPA) documentation is prepared per SOP-FMPC-0518 to determine whether an Environmental Assessment or Environmental Impact Statement is appropriate. Friable material with a significant hazard ranking, as described in the AMP and quantified by the Site Survey, is

**ASBESTOS ABATEMENT REMOVAL ACTION
REMOVAL ACTION NO. 26**

Asbestos Program (con't)

targeted for immediate abatement. Non-friable asbestos is evaluated with information from the ongoing Health & Safety Hazard Assessments (Step 7), the OU3 RI/FS, Safe Shutdown Program, and other OU3 removal actions (Step 8) to determine whether abatement is appropriate and compatible with final remedial design for OU3. Since much of the ACM on site is presently non-friable, the consideration for radiological concerns is often as great as the hazard associated with airborne asbestos. Thus, ongoing abatement activity to address the potentially more hazardous ACM on site is performed by a dedicated team of asbestos workers who are certified by the Ohio Department of Health (DOH) as asbestos hazard abatement specialists, and, who are also trained in the other radiological, physical, and chemical hazards at the FEMP.

Step 4a - Agency Notification

Once the determination of the appropriate action has been made, the Southwest Ohio Air Pollution Control Agency (SWOAPCA) is notified of demolition and renovation activities, as described in Step 4a. These notifications are made according to department procedure N-5, 90-100 and these Notices of Intent (NOIs) are also copied to the OEPA DOE Coordinator's office for demolitions or renovations involving quantities of ACM greater than the CAA NESHAP subpart M reportable quantity. This fulfills the reporting requirements of 40 CFR 61.145 and OAC 3745-20.

In October 1991, all asbestos abatement activities at the FEMP were categorically excluded from further National Environmental Policy Act (NEPA) documentation for 1992 and 1993. Additional documentation for 1994 and beyond will be processed per SOP-FMPC-0518 when the present exclusion expires.

Step 4b - In situ Maintenance

If it is determined that small scale, short duration abatement work or wet wrapping is required, the site Asbestos Operations & Maintenance (O&M) manual and IRS&T department procedures ("Control of Permits for Accomplishing Hazardous Work", "Issuing Permits for Asbestos Work") detail the in-situ maintenance or minor removal/renovation practices to be followed in Step 4b.

These standards comply fully with the construction and general abatement requirements of OSHA 1926.58 and OSHA 1910.120 for small scale, short duration work. All work performed is done by trained abatement workers or DOH licensed asbestos abatement contractors.

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Asbestos Program (con't)

Step 5 - Asbestos Removal

When large scale removals, demolitions, or renovations involving ACM are required (Step 5), the major abatement projects require oversight by the Industrial Hygiene Section, as described by the department procedure "Control of Work Involving Asbestos." This document, coupled with the procedures for specifying how and when to issue site permits for asbestos abatement or hazardous work, provides for the necessary program management oversight to ensure compliance with the removal and renovation requirements in OSHA and CAA regulations.

The Asbestos O&M manual also provides guidance for minor removals, consistent with the "Control of Work" documents. Interim storage of the removed ACM is addressed in the Waste Management procedure for "Control and Utilization of Contaminated Trash Dumpsters".

Step 6 - Asbestos Waste Management

As Step 6 and the Asbestos Control Policy indicate, removed waste is managed as part of the comprehensive Waste Management Program at the FEMP. This program was previously described in an earlier compendium submittal for Removal Action #9. To ensure a safe program transition after the material is removed, packaging requirements specified by the "Packaging of Low Level Waste" procedure, and directions previously discussed in the "Control & Utilization of Contaminated Trash" procedure, provide guidance for the preparation of asbestos waste for management within the sitewide Waste Management Program.

Presently, there are approximately 1,000,000 lbs. of packaged ACM waste stored at the FEMP. Most, if not all, of this material is targeted for shipment to the Nevada Test Site (NTS) as low level radioactive waste. Authorization to ship contaminated asbestos waste is still being negotiated with NTS, but other DOE and commercial asbestos landfills are being considered. On site segregation of radiologically contaminated ACM from non-radiologically contaminated material is being pursued in an effort to broaden the possibilities for off site disposal, as well as reduce the costs and burden of burial as low level waste at NTS.

Step 7 - Ongoing Hazard Assessment

During the implementation of the Asbestos Program from the first step "Identification of the ACM" hazard to its "Removal" (Step 5) and final disposition under "Waste Management" (Step 6), the age and condition of the asbestos material require surveillance and assessment to ensure the current characterization of the ACM is accurate.

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

3604

Asbestos Program (con't)

DOE Order 5480.10 prescribes the type of Industrial Hygiene Program that is required to ensure hazards such as ACM are routinely investigated. The Industrial Health & Safety manual defines the specific requirements and responsibilities for performing hazard assessments and the Control of Work procedure details the precautions to be taken during the work involving asbestos.

Step 8 - Long Term Plans

Short term (< 5 years) plans for abatement of (friable) asbestos that has been given an AHERA hazard ranking greater than four have been fully developed, and are currently being executed as part of the ongoing Asbestos Program abatement activities. **General, long term (> 5 years) plans** have also been developed, and both sets of plans are described in the "FEMP Asbestos Abatement Plans" included in Section III, Step 8.

As the condition and quantities of ACM are subject to change, other activities at this site effect and sometimes mandate changes in the plans for removal or in-situ maintenance of asbestos. As a result, **more detailed long term plans** for removal or in-situ maintenance of asbestos are presently being developed compatible with the "Study for Systematic Removal of Buildings and Facilities", "Plant 7 Dismantling Work Plan", "OU3 RI/FS Work Plan Addendum", "OU3 Remedial Investigation Report", and the "OU3 Feasibility Study Report". All of these documents are scheduled for submittal after this Removal Action Compendium, so the current plans only reflect information from the "Asbestos Survey Assessment for the FEMP" and the "Safe Shutdown Work Plan". Those plans call for the immediate abatement of nearly 3,000 linear ft. of asbestos pipe insulation and approximately 100,000 sq. ft. of deteriorated asbestos transite from five buildings at the FEMP. The demolition of Plant 7 also involves asbestos removal, but that non-critical abatement will be performed as part of Removal Action #19, and is considered part of a **long term** abatement project. Another 75 minor removals will be scheduled to address the ACM requiring immediate attention (hazard ranking of 7), as identified during the Site Survey.

Steps 9 and 10 - Training and Quality Assurance

Steps 9 and 10 identify the Training and Quality Assurance support systems that are designed to ensure that all the ACM regulatory requirements, Asbestos program site procedural requirements and related hazardous material requirements are not only communicated, but are implemented correctly, and updated to represent the most accurate information available.

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Asbestos Program (con't)

As described in almost every preceding step, training is an integral part of nearly every element of the Asbestos Program. General sitewide hazard training per the requirements of OSHA 1910.120 is administered by the Centralized Training section of the IRS&T department. Additional specific Asbestos Program training, performed by EPA approved trainers, is provided for Asbestos Abatement workers and their supervisors.

The FEMP "Asbestos Training Requirements" mandated for the supervisors and Asbestos abatement workers exceeds the requirements specified in OSHA 1926.58, as all abatement workers receive EPA approved 32 hour OSHA 'competent person' training, regardless of the size of the abatement activity. All site personnel receive Asbestos Awareness training as part of the accredited sitewide training program developed to meet the requirements of OSHA 1910.120.

Additional OSHA training for facility owners and other personnel is provided to ensure individuals responsible for buildings containing ACM have a heightened awareness of their particular hazards.

A system for performing self-assessments and asbestos program evaluations pursuant to the DOE Self-Assessment Guidance Document has been instituted to ensure training, program elements and site documents are kept current with newly promulgated regulations or revisions to existing requirements. Audits along with other Asbestos Program quality assurance surveillances, are performed in support of this process. These complement the implementation of the sitewide Quality Assurance Plan, and ensure that the work practices follow the updated documents. Violations are noted in QA Deviation Corrective Action Reports that are reported to the Environmental Management department, where plans to correct the problem are developed and managed to completion.

General Information about Steps 1-10 and the Compendium

It is recognized that revisions to existing policies and procedures to respond to evolving program needs or unique site conditions are an integral part of a successful program. The enclosed procedures are intended to be a living document, meeting current regulatory requirements while retaining the flexibility to respond to changes in an efficient manner. Changes or updates to the provided documentation may be necessary to ensure the continuity of operations, based on new requirements. Consistent with arrangements made in the January 15, 1992, Phase III annual review of potential new removal actions, updates to the compendium of existing procedures and documentation for the ongoing Asbestos Abatement Removal Action shall be submitted to the USEPA for review and approval on an annual basis, commencing on June 30, 1993.

**REMOVAL ACTION NO. 26
ASBESTOS ABATEMENT REMOVAL ACTION**

Integration with the Operable Unit 3 (OU3) RI/FS

The inventory of asbestos and asbestos contaminated materials that currently exist on pipes, buildings, walls, tanks, and other surfaces of equipment used in the nine production plants are within the scope of OU3 of the ongoing site-wide RI/FS.

Integration with the Operable Unit 3 (OU3) RI/FS (con't)

Consistent with the provisions of the NCP, removal actions shall be appropriately integrated with the ongoing RI/FS, including ensuring that appropriate documentation is entered into the Administrative Record. This integration is required to document any action taken which may affect site conditions relative to the Operable Unit as well as to ensure the removal action is supportive of potential final remedial objectives. Within the FEMP Administrative Record, a separate file shall be established for placement of supporting documentation for the Asbestos Removals (Asbestos Program) Removal Action No. 26. Included in the Administrative Record file will be all key program documentation, including this Work Plan submittal consisting of current Asbestos

Abatement Removal Action work procedures, and a compilation of appropriate materials disposition records for ACM, are encompassed within this Removal Action.

The implementation of Asbestos Abatement Removal Action activities clearly supports the remedial objectives for Operable Unit 3 by providing a necessary preliminary step for preparation of these areas for subsequent remedial activities. The Program actions are consistent with final remedial actions based on the fact that mitigation of personnel/environmental risk and safe, permanent disposition of FEMP wastes/materials are ultimate goals.

Close coordination will be maintained with the ongoing RI/FS for OU3 and other removal actions to ensure that planned activities appropriately support RI/FS field investigations and alternative evaluations by incorporating interim abatements of ACM into baseline risk determination and site characterizations.

Rev. 1 PJB 8/6/92

ASBESTOS CONTROL POLICY

Figure 1

All FEMP activities that involve asbestos containing material (ACM), or are conducted in areas where ACM is located, will be performed in such a manner as to protect employees from harmful exposures, prevent environmental emissions that endanger public health or the environment, and ensure compliance with the regulations and legal agreements addressing such activities.

In support of this policy statement, the following corollaries describe the fundamental principles upon which the Asbestos Management Plan and the Program organization have been established:

- o A committee shall be established and be comprised of the most knowledgeable individuals, representing the principal organizations involved in abatement activities at a level closest to the level of execution, to develop and update asbestos policies and procedures, set specific site goals, periodically evaluate progress, communicate information to their respective organizations, and self assess the Asbestos Program.
- o Adequate training shall be provided to ensure all employees understand the hazards of ACM in their work area and that abatement workers can demonstrate the procedures designed to accomplish their work, while protecting employee and public health and the environment.
- o Asbestos abatement activities shall be communicated to SWOAPCA and performed according to the site specific procedures incorporating worker protection (OSHA 1926.58) standards, environmental standards (40 CFR 61, subpart M) and the other requirements detailed in the Asbestos Management Plan, as verified by self assessments and internal surveillance audits.
- o ACM will be identified, and initial hazard assessments used, to plan short term (<5 years) abatement activities within an evolving program. Since asbestos abatement is part of a thirty year cleanup plan for the FEMP, and the scope of the project involving hazard abatement extends beyond asbestos, asbestos management is continually changing to reflect current regulations and the overall site activities regarding hazard abatement. The Asbestos Program (AP) will be managed within the Clean Air Program (CAP) of the Environmental Management Department where AP activities will be planned, budgeted and scheduled consistent with the CERCLA based cleanup. Activities across and within departments will be coordinated by the CAP Asbestos Program Coordinator.
- o Long term removal plans will be developed in five year increments for the life of the FEMP as part of the Asbestos Management Plan (AMP). The AMP will be annually updated to reflect the changing scope of the CERCLA remedial effort and the relative hazard of the ACM.
- o Storage and disposal of removed ACM at the site will be managed as part of the comprehensive Waste Management Program at the FEMP.
- o A compendium of the procedures used to control ACM will be forwarded to USEPA and annually updated and reissued in an effort to integrate asbestos abatement work with the CERCLA cleanup of the FEMP. REV. 2- 3/31/92 PJB

Logic Flow Chart for Asbestos Program

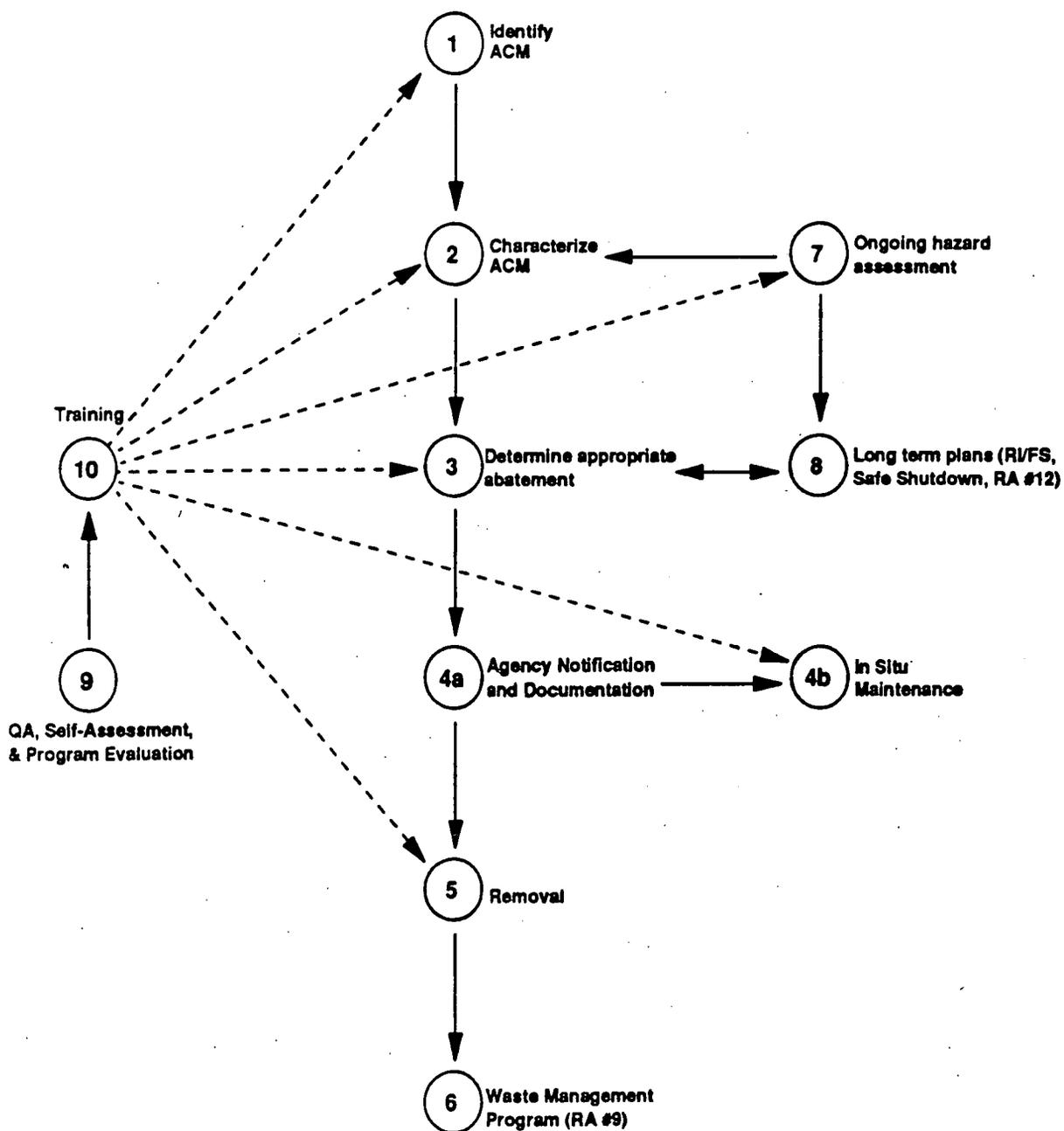
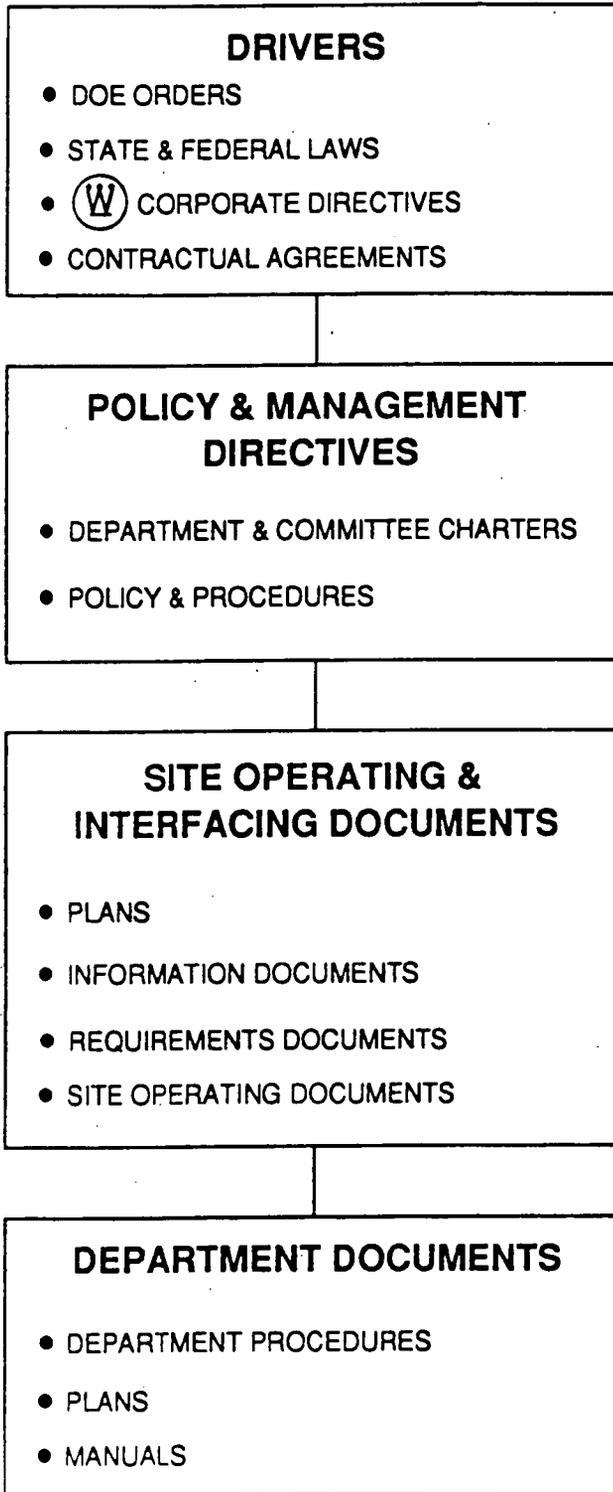


Figure 2

FIGURE 3

ASBESTOS REMOVALS - ASBESTOS PROGRAM WEMCO SITE DOCUMENT PROGRAM HIERARCHY



CHARTER - A document defining the work scope & responsibilities of a department, committee, council, board or function.

POLICY & PROCEDURE - A statement of management policy followed by a series of administrative instructions, including responsibilities & principal actions affecting two or more departments.

PLAN - A document identified as required by a driver or information defining actions to be taken to meet a requirement.

INFORMATION DOCUMENT - Information compiled on a subject and presented to be informative for personnel of the FEMP or as required by external organizations.

REQUIREMENTS DOCUMENT - A document defining requirements for an activity affecting two or more WEMCO organizations.

SITE OPERATING DOCUMENT - A procedure that provides detailed operating instructions for an activity to two or more WEMCO organizations.

DEPARTMENT PROCEDURE - A procedure that provides instructions to only one WEMCO organization.

PLAN - A document identified as required by a driver for only one WEMCO organization in order to meet a requirement.

MANUAL - A document that provides detailed requirements/ instruction affecting only one WEMCO organization.

TABLE I

STEP (Section II Procedures)	GENERAL SUPPORTING DOCUMENTATION	DESCRIPTION/COMMENTS
GENERAL	<p>IN-FMPC-6007, Site Documentation System</p> <p>SSOP-0023, Deviation and Corrective Action Reporting</p> <p>RM-FMPC-0002, Centralized Training Program Manual*</p>	<p>This site procedure defines the system of documents by which the FEMP is managed and details the requirements for development, preparation and control of these documents.</p> <p>This procedure identifies the assigned responsibilities and required actions for identifying, documenting, evaluating and providing dispositions and corrective action plans for deviations and corrective actions observed during audits, reviews, surveillances, inspections or tests performed at the Site by both internal and external organizations, as well as the evaluation of supplier-proposed dispositions and corrective actions plans.</p> <p>This site manual establishes the requirements for all personnel involved in the development and delivery of training. The manual is prepared in accordance with DOE Order 5480.18. The manual also references the DOE Training Accreditation Program (TAP) Manuals. Copies of this document will be made available upon request.</p>

TABLE I

STEP (Section II Procedures)	GENERAL SUPPORTING DOCUMENTATION	DESCRIPTION/COMMENTS
GENERAL	<p>FMPC-2139, FMPC Quality Assurance Plan*</p> <p>FMPC Site Health and Safety Plan*</p> <p>Asbestos Control Policy</p>	<p>This site manual incorporates the policies for achieving or exceeding the required quality levels in the operation of the Site. The program is based on the criteria specified in ANSI/ASME NQA-1. DOE Orders 5700.6 and 5700.6B specify NQA-1 as the preferred standard for Quality Assurance. Copies of this document will be made available upon request.</p> <p>This site plan provides the overall means for planning and implementing the job site characterization, health, and safety training and job orientation for personnel. Copies of this document will be made available upon request.</p> <p>This Environmental Management Directive provides guidance and an outline for an Asbestos Management Plan and Program that protects FEMP employees, prevents environmental emissions and meets all regulatory requirements or FEMP legal agreements.</p>

TABLE I

STEP (Section II Procedures)	GENERAL SUPPORTING DOCUMENTATION	DESCRIPTION/COMMENTS
GENERAL	ASBESTOS MANAGMENT COMMITTEE CHARTER	This non-operational document details the responsibilities of the Asbestos Management Committee that was organized to ensure line management responsibility for implementing the Asbestos Control Policy and Management Plan.
	FMPC RESPIRATORY PROTECTION MANUAL, FMPC-2152	This non-operational document describes the Personal Protective Equipment required for all hazardous material work, citing specific asbestos respiratory requirements.
	MANAGEMENT OF HAZARDOUS WASTE, FMPC-0519	This Management Directive provides general guidance for the preparation of removed ACM for management in the FEMP Waste Management Program.
	FEMP RADIATION CONTROL MANUAL, FMPC 2084	This non-operational manual presents the specific radiological control requirements and protective measures that are to be employed at the FEMP.
	RADIATION CONTROL, FMPC-505	This procedure identifies the safety requirements and assigns the responsibilities for the control of radioactive materials and personnel radiation exposure and contamination at the FEMP.

TABLE I

STEP (Section III Procedures)	IMPLEMENTING PROCEDURES	DESCRIPTION/COMMENTS
STEP 1 Identification of ACM	ASBESTOS MANAGEMENT PLAN, PL-FMPC-3002 ASBESTOS SURVEY & ASSESSMENT FOR THE FEMP*	<p>This Site Operation Work Plan details the methodology for identification and hazard assessment of ACM on site. Now that the Site Survey is complete, this document is currently being revised to describe the entire asbestos program in a non-operational plan.</p> <p>This report identifies and provides an assessment of the ACM at the FEMP during CY1991. It is currently being updated to reflect continuing abatement actions that are part of the Asbestos Program removal/remediation actions or other CERCLA removal/remedial actions, in an effort to keep the inventory accurate for final OU3 remediation. Copies of this document can be made available upon request.</p>

<p>STEP 2 Characterize ACM</p>	<p>CONTROL OF WORK INVOLVING ASBESTOS, IH-03</p> <p>ASBESTOS MANAGEMENT PLAN PL-FMPC-3002</p> <p>ASBESTOS SURVEY AND ASSESSMENT FOR THE FEMP*</p>	<p>This IH section document provides general guidance and requirements for all work involving asbestos, focusing primarily on abatement work (contractors and WEMCO personnel). Section 5.7 describes emergency procedures i.e. handling spills or incidents involving asbestos.</p> <p>See above description/comments as described in Step 1.</p> <p>See above description/comments as described in Step 1.</p>
<p>STEP 3 Determine appropriate abatement</p>	<p>COMPLETION OF NEPA DOCUMENTATION, SOP-FMPC-0518</p> <p>ASBESTOS MANAGEMENT PLAN, PL-FMPC-3002</p> <p>OU3 RI/FS WORK PLAN ADDENDUM</p> <p>ASBESTOS SURVEY AND ASSESSMENT FOR THE FEMP*</p>	<p>This procedure describes the NEPA documentation Program.</p> <p>See above description/comments as described in Step 1.</p> <p>Due to U.S. EPA 6/2/92.</p> <p>See above description/comments as described in Step 1.</p>
<p>STEP 4a Notify Regulatory Agencies and document removals, renovations, and demolitions involving ACM</p>	<p>NOTIFICATION PROCEDURES, RCG-90-100</p> <p>COMPLETION OF NEPA DOCUMENTATION, SOP-FMPC-0518</p>	<p>This Site Standard Operating Procedure ensures that all removals, renovations and demolitions involving asbestos at the FEMP are conducted with proper regulatory notification.</p> <p>This policy describes the NEPA documentation program.</p>

<p>STEP 4b In situ Maintenance for Operations and Maintenance (O&M)</p>	<p>ASBESTOS OPERATIONS & MAINTENANCE MANUAL, IN-6029</p> <p>CONTROL OF PERMITS FOR ACCOMPLISHING HAZARDOUS WORK, FMPC-0516</p> <p>ISSUING PERMITS FOR ASBESTOS WORK, SP-P-41-006</p>	<p>This Site Operation document provides a detailed description of procedures to be followed during small scale, short duration asbestos work, performed primarily by WEMCO personnel.</p> <p>This procedure establishes positive means for controlling work tasks that involve all hazardous or potentially hazardous materials, equipment, operations or activities. The procedure describes the responsibilities and means for control of work by WEMCO employees, subcontractor personnel, and/or others involved with any of the following activities: working with asbestos; working on a chemically-hazardous system; open flame and/or welding activities; working with a radioactive material; and entering or working in a confined space.</p> <p>This section document provides specific instruction to ensure that exposures of employees to asbestos are prevented or within acceptable limits by having IH techs. preview the procedures for any job involving asbestos-containing materials.</p>
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<p>STEP 5 Removal</p>	<p>CONTROL OF WORK INVOLVING ASBESTOS, IH-03</p> <p>CONTROL AND UTILIZATION OF CONTAMINATED TRASH DUMPSTERS, 20-C-604</p> <p>ASBESTOS OPERATIONS & MAINTENANCE MANUAL, IN-6029</p> <p>CONTROL OF PERMITS FOR ACCOMPLISHING HAZARDOUS WORK, FMPC-0516</p> <p>ISSUING PERMITS FOR ASBESTOS WORK, SP-P-41-006</p>	<p>This document details the Health & Safety requirements for <u>any</u> asbestos work performed by WEMCO or subcontractor personnel at the FEMP.</p> <p>This department procedure describes the responsibilities for control of contaminated waste prior to offsite disposal.</p> <p>See above description/comments as described in Step 4b.</p> <p>See above description/comments as described in Step 4b.</p> <p>See above description/comments as described in Step 4b.</p>
<p>STEP 6 Waste Management Program</p>	<p>PACKAGING, ON-SITE MOVEMENT AND OFF-SITE SHIPMENT OF MATERIAL, PP-0134</p> <p>LOW LEVEL WASTE MANAGEMENT PROCEDURES</p>	<p>This department SOP describes the packaging that must take place to ship (asbestos) material offsite. (NVO-325 requirements)</p> <p>See Compendium describing waste management program submitted to USEPA 8/31/91 to fulfill Consent Agreement (CA) IX1.b, "Removal of Waste Inventories," Removal Action (RA) #9.</p>

<p>STEP 7 Ongoing hazard assessments</p>	<p>DOE Order 5480.10, "Contractor Industrial Hygiene Program"</p> <p>IH&S Manual, FMPC 2128</p> <p>CONTROL OF WORK INVOLVING ASBESTOS, IH-03</p>	<p>This Site Standard requirement guidance for the Industrial Hygiene Program, establishing a program for regular hazard assessments that is monitored by <u>certified</u> Industrial Hygienists.</p> <p>This Industrial, Radiological Safety and Training (IRS&T) department document details the specific Health & Safety practices that ensure worker protection from all FEMP hazards, including asbestos.</p> <p>See above description/comments as described in Steps 2 & 5.</p>
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<p>STEP 8 Long Term Plans (RI/FS; Safe Shutdown, RA #12)</p>	<p>FEMP Asbestos Abatement Plans</p> <p>Study for Systematic Removal of Buildings and Facilities*</p> <p>Work Plan for Plant 7 Dismantling*</p> <p>Safe Shutdown Work Plan*</p> <p>Asbestos Survey & Assessment*</p> <p>OU3 RI/FS Work Plan Addendum*</p> <p>OU3 Remedial Investigation Report*</p> <p>OU3 Feasibility Study Report*</p>	<p>Provides a general description of the short (< 5 years) and long term plans for the abatement of potentially friable and non-friable ACM, respectively.</p> <p>Ref. CA 1X.4, this study will identify buildings no longer needed and will provide guidance for future demolitions and renovations which is key to determining appropriate abatement actions. Due to USEPA 1/15/93.</p> <p>Ref. CA 1X.2, the Work Plan for Removal Action #19 is to be transmitted to USEPA 4/20/93.</p> <p>Submitted to USEPA 10/31/91 in fulfillment of (CA) Consent Agreement Removal Action (RA) #9.</p> <p>Completed 2/28/92. Available upon request.</p> <p>Due to USEPA, 6/2/92.</p> <p>Due to USEPA, 6/11/96.</p> <p>Due to USEPA, 11/5/96.</p>
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<p>STEP 9 Self-Assessment and Program Evaluation</p>	<p>Asbestos Program Internal Audit/Self-Assessment System</p> <p>DOE Self-Assessment Guidance Document</p>	<p>This Non-operational Plan details the schedule and contents of the Asbestos Program Self-Assessment and QA Audit system.</p> <p>This Site Standard requirement outlines the self-assessment program DOE facilities are required to have to ensure continuous program improvement.</p>
<p>STEP 10 Training</p>	<p>Asbestos Program Training Matrix</p>	<p>These Site Standard Requirements describe the Asbestos Program training requirements for Abatement workers, Supervisors of Abatement workers, Facility Owners and all other site personnel.</p>

**ASBESTOS PROGRAM
LIST OF ACRONYMS**

ACM	- Asbestos Containing Material
AHAS	- Asbestos Hazard Abatement Specialist
AHERA	- Asbestos Hazard Evaluation Response Act
AHES	- Asbestos Hazard Evaluation Specialist
AMC	- Asbestos Management Committee
AMP	- Asbestos Management Plan
ARAR	- Applicable or Relevant and Appropriate Requirement
BI/MP	- Building Inspector/Management Planner
CA	- Consent Agreement
CAA	- Clean Air Act
CAP	- Clean Air Program
CERCLA	- Comprehensive Environmental Response, Compensation, and Liability Act
DOE	- Department of Energy
DOH	- Ohio Department of Health
EC&QA	- Environmental Compliance and Quality Assurance Department
IRS&T	- Industrial, Radiological Safety and Training
NCP	- National Contingency Plan
NEPA	- National Environmental Policy Act
NESHAP	- National Emission Standards for Hazardous Air Pollutants
OAC	- Ohio Administrative Code
OU3	- Operable Unit 3
QA	- Quality Assurance
RA	- Removal Action
RI/FS	- Remedial Investigation/Feasibility Study
ROD	- Record of Decision

**ASBESTOS PROGRAM
LIST OF ACRONYMS**

- SOP - Site Operating Procedure
- SWOAPCA - Southwest Ohio Air Pollution Control Agency
- TAP - Training Accreditation Program
- USEPA - United States Environmental Protection Agency
- WEMCO - Westinghouse Environmental Management Company of Ohio (previously
WMCO)
- WMCO - Westinghouse Materials Company of Ohio (now WEMCO)