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ASBESTOS WASTE DISPOSAL FROM THE FEMP

02/22/93

FERMCO/DOE-FN

C:OP:93-128

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LETTER



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Restoration Management Corporation P.O. Box 398704 Cincinnati, Ohio 45239-8704 (513) 738-6200

February 22, 1993

U. S. Department of Energy
Fernald Environmental Management Project
Letter No. C:OP:93-128

Mr. Thomas J. Rowland, Acting Manager
DOE Field Office, Fernald
P. O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Rowland:

CONTRACT DE-AC05-92OR21972, ASBESTOS WASTE DISPOSAL FROM THE FEMP

The purpose of this letter is to review the status of the disposition or shipment of asbestos waste from the FEMP, communicate the plans for reducing the backlog asbestos waste stored on site, and to request DOE-FN site office assistance in accomplishing specific tasks that are part of these plans. The goal is to initiate disposal or shipments of radioactive asbestos containing material (ACM) within the next six months, and to begin segregation of asbestos from radiological materials management areas (RMMAs) within that same time frame.

STATUS OF ASBESTOS WASTE SHIPMENTS OR ACM DISPOSITION

Recent History

With one exception, no asbestos waste has been disposed of or shipped from the FEMP in the last four years. That one exception occurred on December 22, 1992, when approximately 3000 LBS. or 60 drum equivalents of non-radioactive ACM were buried at a local sanitary landfill (Rumpke).

Until removals were made for the December shipment, no radiological segregation of ACM had been performed at the FEMP. Asbestos removals that were performed simply added to the existing inventory of low level radioactive asbestos waste, bound for final disposition at the Nevada Test Site (NTS) or some other DOE LLW storage/disposition facility. Unfortunately, there is probably only a small (<30%) amount of asbestos at the FEMP that can be removed or segregated as non-radioactive asbestos, especially since the waste acceptance criteria for asbestos removed from radiological areas (RMMAs) is not clearly established. Until a definitive criteria is established, the segregation and off-site disposal efforts will continue to be limited to asbestos removals from non-radiological areas (non-RMMAs). As a result, only those asbestos removals planned for non-radiological areas have an immediately available disposal site as of this writing.



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Three important efforts are underway which could impact the disposal of ACM from the FEMP.

First, FERMCO is currently revising the FEMP application to dispose of radioactively contaminated asbestos waste at the NTS. This effort would open a door for disposal of the radioactive ACM from radiologically controlled areas at the FEMP.

Second, the FEMP is continuing to negotiate with DOE-FN and DOE-HQ about the 'release' criteria or performance objective that will enable the FEMP to ship non-radioactive hazardous waste, originating in an RMMA, to a commercial TSD facility. This initiative would provide a means of segregating non-radioactive ACM that is removed from an RMMA, which could utilize an existing contract for non-radioactive asbestos disposal at a local sanitary landfill (Rumpke).

The third action underway involves the negotiation of a blanket (all DOE sites) contract for disposal of mixed radioactive wastes at a commercial disposal facility, Envirocare of Utah, Inc. This contract is being handled out of DOE Oak Ridge, but may enable the FEMP to dispose of its radioactive asbestos along with mixed (RCRA) radioactive waste.

Preliminary estimates are that NTS shipments of radioactively contaminated ACM could resume by May 1993, but projections as to when DOE-HQ will grant approval for shipment of non-radioactive ACM from an RMMA are less certain. Likewise, the contract with Envirocare appears to be months from settlement.

Current Inventory

As Attachment I indicates, over 4,000,000 lbs. of asbestos waste in more than 800 different containers have accumulated at the FEMP. All of this material has been classified as radioactively contaminated ACM, though no efforts have been made to evaluate or segregate this material since most of it originated in an RMMA. Efforts to segregate this waste material into radioactive and non-radioactive components would obviously involve post-packaging evaluations.

Another 2,000,000 sq. ft. of asbestos transite and miscellaneous floor tile, as well as thousands of linear feet of pipe insulation, are scheduled to be removed from RMMAs during removal actions and final remediation. Pre-removal evaluations can be made on all of this material, once the criteria is established for radioactive release from RMMAs. There is a considerable difference in effort and expense, nearly \$18/cu. ft.; between pre-removal versus post-packaging segregation of asbestos material. The earlier the criteria is established, the sooner it can be applied to realize these significant savings.



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Regulatory Considerations

There are two critical issues that require immediate attention if the FEMP is to comply with the intent of state and federal regulations concerning asbestos removal and disposition. As noted during the DOE November ES&H/QA audit, the Ohio Administrative Code (OAC) requires contractors removing asbestos to have "access to at least one asbestos disposal site...for the deposit of all asbestos waste". Though it can be argued whether the actual 'letter of the law' applies to the FEMP, since the FEMP is not an asbestos removal contractor, clearly the intent is for generators to have prior arrangements with an approved disposal site, BEFORE removing the ACM. Similarly, the federal requirements in NESHAP subpart M state that the asbestos waste shall be disposed of "as soon as practical", which even the most tolerant of Agency representatives would interpret as less than five years. In addition to the potential violation of the implicit regulatory guidance, the obvious risks and storage problems that arise mandate quick resolution to achieve a safe, early cleanup of the FEMP. The following plan and schedule is submitted as a proposal for addressing these problems, and they involve active participation by DOE-FN to ensure their success.

RECOMMENDED ACTIONS

The following actions are recommended to accelerate the completion of some of the efforts already underway, as well as to plan for some of the contingencies or complications that may arise during their execution. Please identify a DOE contact for those actions with which you concur:

- 1) Submit a more detailed, asbestos specific, Performance Objective (PO) or 'release' criteria for non-radioactive ACM removed from a radiologically controlled area (RMMA). This would be compatible to the more generic PO that has been written for all non-radioactive hazardous waste, but more specific to the volume contamination possibilities involving ACM. Target data for submittal to DOE-HQ is March 15, 1993.

Concurrence: *Thomas J. Rowland* DOE Contact: DAVE RAST
2/22/93
J. Rowland

- 2) Complete Envirocare Waste Profile information (forms EC-200, EC-500, and EC-650) and submit the necessary waste samples to Envirocare now, reducing the amount of prework that will be needed to initiate waste shipments. This can be done while the FEMP is awaiting DOE-HQ approval, and may in fact help to accelerate the HQ approval process. Target date is April 1, 1993.

Concurrence: _____ DOE Contact: _____



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- 3) Evaluate other DOE facilities (Hanford, Savannah River, etc.) as potential disposal sites for radioactive ACM if the NTS application for disposal cannot be approved by July 1, 1993.

Concurrence: *Thomas J. Rowland* DOE Contact: *D. RAST*
D. Rast 4/19/93

FERMCO is requesting DOE-FN assistance in securing DOE-HQ approval of the Performance Objective for Certification of Non-Radioactive Waste or the PO for asbestos (task #1), and in evaluating the prospect of asbestos disposal at NTS or other DOE facilities (task #3). The FERMCO point of contact for accomplishing these tasks is Brinley D. Varchol, Manager of Waste Management Program. If you have any questions, you can contact Brinley on extension 6919 or Philip J. Beirne on extension 8444.

Very truly yours,

N. C. Kaufman
President

NCK:PJB:lr1
Attachment

c:	D. D. Burns	O. F. Peters
	H. Bailey	C. Reichel
	P. J. Beirne	J. Rowe
	S.M. Beckman	J. G. Rasile
	J. Curtis	M. Strimbu
	D. Dubois	B. D. Varchol
	E. Evered	J. T. Witzeman
	E. Fisher	File Record Storage Copy 102.1
	L. A. Fisher	
	L. W. Johns	
	J. A. Long	
	R. M. Mendelsohn	
	R. P. McCullough	
	D. Paine	

FEMP *INVENTORY OF CONTAINERIZED
ASBESTOS WASTE 1/22/93

CONTAINER DESCRIPTION	NO. OF CONTAINERS	WEIGHT OF CONTAINERS
55 Gallon drums	395	320,420
85 Gallon drums	250	289,260
Sea/land	13	1,647,000
Metal Shipping Containers	22	N/A
White Metal Boxes	108	828,290
Wooden Shipping Containers	48	1,015,430
Totals	836	4,100,400

* From All Materials Inventory, 1/22/93 (Material Description Code 028)

ASBESTOS WASTE DISPOSAL FROM THE FEMP**Recommendations:**

Actions 1, preparation of asbestos specific moratorium package, and action 3, evaluation of alternate DOE disposal facilities, should be implemented for the asbestos waste streams at Fernald. Progress on the Fernald Sitewide Moratorium release package has been slower than anticipated, limiting the scope of review by EM-331 may expedite the disposal of this waste. Evaluation of alternate DOE waste disposal options should be initiated.

Action 2 is not recommended at this time, DOE-HQ has not shown any great movement towards the approval of blanket commercial disposal so the effort to complete these actions is probably not warranted.

D. East