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**OHIO EPA COMMENTS ON THE FEMP
ASBESTOS PROGRAM PROCEDURES UPDATE**

09/10/93

OEPA/DOE-FN

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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

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George V. Voinovich
Governor

September 10, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

Attached are Ohio EPA comments on the FEMP Asbestos Program Procedures Update (Removal Action #26). Ohio EPA apologizes for being late with these comments.

If you have any questions please contact Kurt Kollar or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Kurt Kollar, DERR
Jim Saric, USEPA
Dennis Carr, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

- 1) Commenting Organization: Ohio EPA Commentor: KK
Section #: 3.1.1 Pg #: 1 Line #: Code: c
Original Comment #:
Comment: The references to WEMCO need to be replaced with FERMCO.
Response:
Action:
- 2) Commenting Organization: Ohio EPA Commentor: KK
Section #: 3.2 Pg #: 4 Line #: Code: c
Original Comment #:
Comment: Reference the fact that the company is licensed for the
removal of asbestos materials by the State.
Response:
Action:
- 3) Commenting Organization: Ohio EPA Commentor: KK
Section #: 3.2 Pg #: 4 Line #: Code: c
Original Comment #:
Comment: The definitions involving asbestos related positions should
be modified to indicate the certification obtained for each position.
Response:
Action:
- 4) Commenting Organization: Ohio EPA Commentor: KK
Section #: 3.2 Pg #: 5 Line #: Code: c
Original Comment #:
Comment: The definition for certificate is misleading. It implies
one could pick the title one wishes rather than being required to be
trained in each of the appropriate positions before certification is
given for that specific title.
Response:
Action:
- 5) Commenting Organization: Ohio EPA Commentor: KK
Section #: 3.2 Pg #: 6 Line #: Code: c
Original Comment #:
Comment: HEPA stands for High Efficiency Particulate Air filter
Response:
Action:
- 6) Commenting Organization: Ohio EPA Commentor: KK
Section #: 6.1 Pg #: 15 Line #: Code: c
Original Comment #:
Comment: Please expand the description of the Asbestos Program
Coordinator duties as to inventorying the ACM. It is a little unclear.
Response:
Action:
- 7) Commenting Organization: Ohio EPA Commentor: KK
Section #: 109.3 Pg #: 27 Line #: Code: c
Original Comment #:
Comment: The project submittals stop after the start up of work for
items #7, 9 & 10. These items should have information submitted

during work to verify certain aspects of the project. Number 7 & 10 should have daily log notes submitted to ensure the integrity of the containment has not jeopardized. Number 9 should have the contractor's OSHA monitoring results evaluated to ensure adequate respiratory protection and that abatement procedures are being followed (aka ACM is being wetted).

Response:

Action:

- 8) Commenting Organization: Ohio EPA Commentor: KK
 Section #: 10.4 Pg #: 28 Line #: license Code: c
 Original Comment #:
 Comment: Is it the contracting or the contracted company's responsibility to have the abatement license.
 Response:
 Action:
- 9) Commenting Organization: Ohio EPA Commentor: KK
 Section #: 10.7 Pg #: 37 Line #: training Code: c
 Original Comment #:
 Comment: The person should be required to have proof of obtaining the refresher course certificate as applicable.
 Response:
 Action:
- 10) Commenting Organization: Ohio EPA Commentor: KK
 Section #: 11.2 Pg #: 42 Line #: stop action levels Code: c
 Original Comment #:
 Comment: The a & b statements are for the inside of the work area. Assuming one of the paragraphs is for the zone outside the work area neither would be appropriate. Please clarify.
 Response:
 Action:
- 11) Commenting Organization: Ohio EPA Commentor: KK
 Section #: 11.2 Pg #: 48 Line #: table Code: c
 Original Comment #:
 Comment: clarify table
 Response:
 Action:
- 12) Commenting Organization: Ohio EPA Commentor: KK
 Section #: 11.2 Pg #: 49 Line #: table Code: c
 Original Comment #:
 Comment: Placement of a sample directly in the exhaust from a pressure differential device would not provide representative fiber levels in the air. Monitoring the area where the discharge is vented (hopefully this is what is meant by the statement) is valid. DOE should try to vent all the exhaust air to the outside of the building when feasible.

Why will a sample be collected outside the building each day? Once background is established it can be referenced.

Response:

Action:

- 13) Commenting Organization: Ohio EPA Commentor: KK
Section #: 11.8 Pg #: 116 Line #: minor work Code:
Original Comment #:
Comment: The definition of what constitutes minor appears to be reversed. Please revise if so. Linear feet is normally associated with piping and square feet with flat surfaces.
Response:
Action:
- 14) Commenting Organization: Ohio EPA Commentor: KK
Section #: 11.9 Pg #: 133 Line #: decon Code: c
Original Comment #:
Comment: What actions will be initiated if workers fail to properly decontaminate themselves upon exiting the work area? Failure to properly decontaminate one's self has documented case history of causing asbestos related diseases to other parties attributed to asbestos fibers remaining on workers body and/or clothing.
Response:
Action:
- 15) Commenting Organization: Ohio EPA Commentor: KK
Section #: ? Pg #: ? Line #: ? Code: g
Original Comment #:
Comment: What level of negative pressure is to be maintained in the containment. Will work stop if the pressure differential is lost?