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**REMOVAL ACTION 19, PLANT 7
DISMANTLING, REMOVAL ACTION WORK
PLAN**

09/21/93

**DOE-2981-93
DOE-FN/OEPA
4
RESPONSES**



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Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

SEP 2 1993

DOE-2981-93

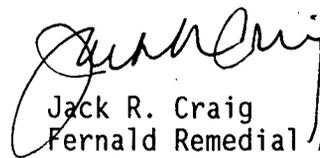
Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402

Dear Mr. Mitchell:

REMOVAL ACTION 19, PLANT 7 DISMANTLING, REMOVAL ACTION WORK PLAN

The purpose of this letter is to transmit, for your review and approval, responses to the Ohio Environmental Protection Agency's (OEPA) comments on the revised Plant 7 Dismantling Removal Action Work Plan. If you or your staff have any questions, please contact Art Murphy at (513) 648-3132.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Murphy

Attachment: As Stated

cc w/att:

K. A. Chaney, EM-424, TREV
D. R. Kozlowski, EM-424 TREV
G. Jablonowski, USEPA-V, AT-18J
J. Saric, USEPA-V, AT18J
J. Kwasniewski, OEPA-Columbus
P. Harris, OEPA-Dayton
M. Proffitt, OEPA-Dayton
T. Schneider, OEPA-Dayton
J. Michaels, PRC
L. August, GeoTrans
K. L. Alkema, FERMCO
P. F. Clay, FERMCO/19
F. Bell, ATSDR
AR Coordinator, FERMCO

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cc w/o att:

R. L. Glenn, Parsons
J. W. Thiesing, FERMCO/2

Original Comment #6 - The predetermined levels for asbestos fibers have not been stated. Is it the recommended NIOSH standard of 0.01 fcc? Industrial Hygiene will monitor the air inside the workplace. Is the workplace inside or outside the work zone? Ambient background levels for asbestos should be collected prior to the start up of any activities to provide levels for comparison. What fiber level will be needed before teardown of the containment occurs? Will a visual inspection of the asbestos containment area be performed prior to final air sampling when a containment is established?

Response - While friable asbestos is being removed from within Plant 7, the following air sampling schedule has been implemented. Personal TWA air samples are being collected on at least 25% of the workers performing asbestos abatement tasks. A minimum of one TWA sample is being collected for each work task being performed each day. A minimum of one excursion sample is also being collected for each work task being performed each day.

General air samples are being collected daily in the following locations throughout asbestos abatement activities:

- One sample at the exhaust point for each air filtration device.
- One sample in the clean room of the hygiene facility.
- One sample inside each containment while work is in progress.
- One sample outside the entrance to each containment (maximum of two samples per floor).
- One sample outside the regulated area for each negative pressure glove bag removal (maximum of two samples per floor).

FERMCO Industrial Hygiene's role is to ensure that airborne levels of asbestos outside the containments in Plant 7 are below 0.01 f/cc.

After completion of abatement activities and cleaning in each containment, clearance air samples shall be collected after visual inspection of the containment indicates no visible dust present inside the containment. The number of clearance air samples shall meet the following criteria:

- Containment area <500 square feet: 2 samples inside the containment, 1 sample outside the containment.

- Containment area >500 and <3000 square feet: 3 samples inside the containment, 2 samples outside the containment.
- Containment area >3000 square feet: 5 samples inside the containment, 3 samples outside the containment.

To release a containment after completion of asbestos removal, clearance air samples will only be collected after visual inspection of the containment indicates no visible dust/debris present inside the containment. Aggressive air sampling will be performed inside the containment. The containment will be cleared after all air samples collected inside the containment are less than 0.01 f/cc when analyzed by Phase Contrast Microscopy (PCM) per NIOSH Method 7400.

Background air samples were collected in Plant 7 on July 9, 1993 and July 12, 1993. A total of ten general area air samples were collected at several locations inside the building. These samples were analyzed by (PCM) and with a range of <0.003 to 0.010 f/cc. Additional background air samples were collected in Plant 7 on August 6, 1993. The seven general area samples were analyzed by PCM and the results were in the range on <0.004 to 0.005 f/cc.

Action - The Removal Action Work Plan will not be revised since this air monitoring program is presently in-place supporting the on-going activities within Plant 7.