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**CATEGORICAL EXCLUSION DETERMINATION
ASBESTOS ABATEMENT FOR CALENDAR YEARS
1994 AND 1995 NEPA DOC. NO. 438**

01/21/94

**NEPA DOC 438
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NATIONAL ENVIRONMENTAL POLICY ACT

-5090

CATEGORICAL EXCLUSION DETERMINATION

Asbestos Abatement for Calendar Years 1994 and 1995

NEPA Document No. 438

Fernald Environmental Management Project
Fernald, Ohio

Proposed Action

The U. S. Department of Energy (DOE) proposes to properly abate asbestos or manage asbestos in place and prevent the possible migration of asbestos fibers from piping insulation and transite panels that comprise the siding and roofing of many buildings throughout the Fernald Environmental Management Project (FEMP) site.

Location of Action

The proposed action will occur within the boundaries of the 1050-acre FEMP site, which is located in a rural area of southwest Ohio, within Hamilton and Butler counties, approximately 18 miles northwest of downtown Cincinnati, Ohio.

Background

Categorical Exclusion is an update to NEPA Document No. 362, "Asbestos Abatement for Calendar Years 1992 and 1993," which was approved by DOE Headquarters on November 12, 1991.

Earlier construction practices permitted the use of asbestos and asbestos-containing materials (ACM) at the FEMP site on exterior building surfaces (transite) and piping insulation. Accordingly, the FEMP site contains a significant quantity of asbestos used for insulation, roofing, wallboard, and flooring. Due to the age of the facilities and physical and chemical deterioration, some of the asbestos has become friable and represents a hazard.

The FEMP Asbestos Program was initiated to provide management oversight and support for all activities that involve ACM or are conducted in areas where ACM is located. The Asbestos Control Policy focuses on worker protection, prevention of environmental emissions, and compliance with the applicable regulations or regulatory agreements. The proposed action is part of the continuing program at the FEMP site to comply with these regulations.

An Asbestos Site Survey was completed in February 1992. The entire FEMP site was inspected for ACM, which was identified in 56 buildings on site. The condition and hazard assessment of all ACM was determined and all ACM was properly labeled. To ensure that the condition and hazard assessment of the ACM is not degraded over time, every facility with ACM is reinspected annually.

Asbestos Abatement

Description of the Proposed Action

The FEMP proposes to perform asbestos abatement throughout the site during calendar years 1994 and 1995. The determination of appropriate abatement is a process that involves a comprehensive evaluation of the hazards of the ACM and other CERCLA hazardous substances within the particular facility.

Friable material with a significant hazard ranking is targeted for immediate abatement. Non-friable asbestos is evaluated with information from the ongoing Health and Safety Assessments, the Operable Unit 3 (OU3) Remedial Investigation/Feasibility Study (RI/FS), the Safe Shutdown Program, and other OU3 removal actions to determine whether abatement is appropriate and compatible with final remedial design for OU3.

If it is determined that small scale, short duration abatement work or wet wrapping is required, in situ maintenance or minor removal/renovation practices will be followed. When large scale removals, demolitions, or renovations involving ACM (an abatement project of more than 160 square feet or 260 linear feet) are required, Large Project Asbestos Work Practices, Site Requirement 0002 (SR-0002), provides the necessary guidance and specifications. These work practices were submitted to EPA under Removal Action 26, Asbestos Abatement.

In addition to piping insulation, an area of current concern involves the possible migration of asbestos fibers from weathered or chemically attacked transite panels. An Asbestos Fiber Migration Study indicates that asbestos fibers are eroding from the aging transite panels into storm water, soil, and surrounding concrete surfaces. To initiate corrective action, a "Transite Fiber Stabilization Study" was completed to determine the type of products that will bind the asbestos fibers to the transite substrate and bridge the asbestos fibers together to stabilize the friable condition, preventing further migration.

All asbestos abatement activities will be performed by two teams of asbestos workers who are certified by the Ohio Department of Health as Asbestos Hazard Abatement Specialists and are trained in the radiological, physical, and chemical hazards at the FEMP site.

Removed waste is managed as part of the comprehensive Waste Management Program at the FEMP site. To ensure a safe program transition after the radiologically contaminated ACM is removed, packaging requirements specified by the "Packaging, On-site Movement, and Off-site Shipment of Materials," PP-0314, Revision 0, December 1991, and Packaging Low-Level Radioactive Waste (LLRW) for Off-site Disposal," SSOP-0024.

Presently, there are over 4,000,000 pounds of packaged ACM waste stored at the FEMP site. 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; other DOE and commercial facilities are also being considered.

Asbestos Abatement

As the condition and quantities of ACM are subject to change, other activities at the FEMP site affect and sometimes mandate changes in the plans for removal or in situ maintenance of asbestos. The long-term plans for removal or in situ maintenance of asbestos are presently being developed and are compatible with the Facility Utilization Report and the OU3 RI/FS Work Plan Addendum.

Categorical Exclusion to be Applied

The authority for finding this project to be subject to NEPA Categorical Exclusion is contained in Subpart D of the revision to 10 CFR Part 1021, entitled "National Environmental Policy Act Implementing Procedures and Guidelines." The Final Rule and Notice, effective May 26, 1992, includes a revised and expanded list of categorical exclusions that are classes of actions that normally do not require the preparation of either an Environmental Impact Statement or an Environmental Assessment.

The Final Rule and Notice specifically lists in Part 1021, Appendix B to Subpart D, Sec. 1021.410, B1.16, the following as types of actions that are Categorical Exclusions applicable to Specific Agency Actions:

Removal of asbestos-containing materials from buildings in accordance with 40 CFR part 61 (National Emission Standards for Hazardous Air Pollutants), subpart M (National Emission Standards for Asbestos); 40 CFR part 763 (Asbestos), subpart G (Asbestos Abatement Projects); 29 CFR part 1910, subpart I (Personal Protective Equipment), § 1910.134 (Respiratory Protection); subpart Z (Toxic and Hazardous Substances), § 1910.1001 (Asbestos, tremolite, anthophyllite and actinolite); and 29 CFR part 1926 (Safety and Health Regulations for Construction), subpart D (Occupational Health and Environmental Controls), § 1926.58 (Asbestos, tremolite, anthophyllite, and actinolite), other appropriate Occupational Safety and Health Administration standards in title 29, chapter XVII of the CFR, and appropriate state and local requirements, including certification of removal contractors and technicians.

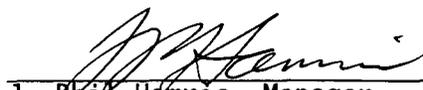
The Asbestos Abatement for Calendar Years 1994 and 1995 meets the requirements for the Categorical Exclusion listed above. It is appropriate since the proposed action as described entails removing or managing asbestos in place and preventing the possible migration of asbestos fibers. All asbestos abatement activities are focused on worker protection, prevention of environmental emissions, and compliance with applicable regulations.

Furthermore, the proposed action will not violate applicable statutory, regulatory, or permit requirements; it will not require siting and construction or major expansion of waste disposal, recovery or treatment facilities; and it will not impact any environmentally sensitive areas (e.g., wetlands, floodplains, or the sole-source aquifer).

Asbestos Abatement

Compliance Action

I have determined that the proposed action meets the requirements for the CX referenced. Therefore, the proposed action is categorically excluded from further NEPA review and documentation.

Approval: 
J. Phil Hamric, Manager
U. S. Department of Energy, Fernald Field Office

Date: 1/21/94