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**ADDENDUM TO THE RI/FS COMMUNITY RELATIONS PLAN FOR  
REMOVAL ACTION NO. 26 - ASBESTOS REMOVALS (ASBESTOS  
PROGRAMS) - DECEMBER 1993**

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**ADDENDUM**  
**TO THE**  
**RI/FS COMMUNITY RELATIONS PLAN**  
**FOR REMOVAL ACTION No. 26**  
**Asbestos Removals (Asbestos Program)**

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Fernald Environmental Management Project  
Fernald, Ohio

U.S. Department of Energy  
Fernald Field Office

December 1993

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## TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
List of Acronyms	ii
Introduction	1
Objectives	2
Background	3
Overview of Community Concerns	5
Highlights of Community Relations Activities	5
Timetable	6
References	7

## LIST OF ACRONYMS

CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act [of 1980] (also known as Superfund)
CRP:	Community Relations Plan
DOE:	U.S. Department of Energy
EPA:	U.S. Environmental Protection Agency
EE/CA:	engineering evaluation/cost analysis
FEMP:	Fernald Environmental Management Project (formerly the Feed Materials Production Center)
FFCA:	Federal Facility Compliance Agreement
NCP:	National Oil and Hazardous Substances Pollution Contingency Plan [of 1990]
RI/FS:	remedial investigation and feasibility study
SARA:	Superfund Amendments and Reauthorization Act [of 1986]

## **Introduction**

This document is prepared as an addendum to the Fernald Environmental Management Project (FEMP) Remedial Investigation and Feasibility Study (RI/FS) Community Relations Plan (CRP), dated August 1992. This addendum addresses Removal Action No. 26, Asbestos Removals (Asbestos Program)

This removal action is being conducted pursuant to the laws, regulations and agreements listed below, and will comply with the provisions of each:

- The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), also known as Superfund, that provides for the investigation and cleanup of uncontrolled hazardous waste sites
  - The Superfund Amendments and Reauthorization Act of 1986 (SARA) that renewed and updated CERCLA
  - The National Oil and Hazardous Substances Pollution Contingency Plan of 1990 (NCP) that spells out how CERCLA and SARA will be implemented
  - The Federal Facility Compliance Agreement of 1986 (FFCA) between the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) that provides for the investigation and cleanup of environmental impacts from past and present activities at the FEMP
  - The Consent Agreement of 1990 that amended the FFCA and fostered consistency among the operable unit concept and the current commitments of the RI/FS program without modifying the underlying objectives
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- The Amended Consent Agreement of 1991 that establishes definitions and schedules for completion of RI/FS documents for the five operable units and identifies additional specific removal actions at the FEMP

The 1990 Consent Agreement specified four removal actions and provided for the identification of three more; these seven are now referred to as the Phase I Removal Actions. The Amended Consent Agreement for the FEMP, signed on September 20 and effective on December 19, 1991, specified 11 additional removal actions, referred to as Phase II Removal Actions.

On January 14, 1992 six more removal actions, known as Phase III Removal Actions, were approved by EPA and three emergency removal actions were initiated. On January 14, 1993 three more removal actions, known as Phase IV Removal Actions, were approved by EPA; however, in May 1993 DOE requested that two of the original Phase IV Removal Actions be eliminated and one removal action recently initiated, be added. EPA approved this recommendation and the four phases now total 29 separate, sequentially numbered removal actions. DOE may identify additional removal actions each year by January 15, if needed.

### Objectives

The objective of removal actions under CERCLA and the NCP is to "...take appropriate action to abate, stabilize, mitigate, or eliminate the release or threat of release..." of hazardous materials or waste in a manner that reduces or eliminates the threat to public health, welfare, or the environment. Removal actions are emergency or short-term responses to immediate threats. They differ from remedial actions in that they are generally more limited in scope and cost.

Removal actions can be divided into three general categories: emergency, time critical, and non-time-critical. They are as follows:

- Emergency removal actions call for an immediate response. An Administrative Record file must be established and affected citizens must be notified.
- Time-critical removal actions have a planning period of less than six months. If on-site removal actions are expected to extend beyond 120 days, then an addendum to the CRP is required based on interviews with community residents and/or public interest groups to identify their concerns and determine ways in which residents would like to become involved.
- Non-time-critical removal actions usually have a planning period of at least six months and dictate the same community relations activities as discussed above. An added requirement is the preparation of an engineering evaluation/cost analysis (EE/CA). In this case, the addendum to the CRP must be completed before the EE/CA approval memorandum is signed.

The specific objective of Removal Action 26, Asbestos Program Procedures, is to mitigate the potential risk of asbestos at the Fernald site to site employees and the environment. The compilation of policies

and procedures are updated and submitted to the USEPA annually to ensure continuity of operations and compliance with current regulatory requirements.

The Fernald Asbestos Program provides comprehensive management oversight and support for all activities that involve asbestos containing material (ACM), or are conducted in areas where ACM is located. The Program is defined by an evolving Asbestos Control Policy for worker protection, prevention of environmental emissions and compliance with applicable regulations or legal agreements. The Policy dictates that removed ACM is managed as part of Fernald's comprehensive Waste Management Program to ensure proper packaging and control of radiologically-contaminated ACM.

An Asbestos Management Committee, comprising Fernald organizations involved in abatement activities, ensures the principles expressed in the Policy are established. The Committee develops sitewide procedures, sets specific abatement and management goals, periodically evaluates progress towards these goals, and communicates corrective activities or general information to the respective organizations.

The Asbestos Program ranges from identification of the ACM to final disposition of the material. Each action is driven and executed by requirements in DOE Orders, Federal, State, and Local laws and regulations, and is enacted through sitewide and department documents.

### **Background**

Removal Action 26 is a Phase III removal action (identified by DOE in January 1992 correspondence to EPA, subsequent to the Amended Consent Agreement). The first element of the program involved a site survey which identified the ACM at the Fernald site. The survey was completed in February, 1992 by certified Asbestos Hazard Evaluation Specialists. The survey identified 56 of 74 facilities as having ACM. Over 2,500,000 sq. ft. of asbestos transite (asbestos-containing concrete panels), 120,000 linear ft. of asbestos pipe insulation, and 32,000 sq. ft. of miscellaneous ACM in the 56 buildings were identified. Certified asbestos specialists from the site monitored every aspect of the survey to ensure that the sampling, analysis, labeling and disposition of the sampled material met all requirements.

The results of the survey have been used to determine asbestos projects at Fernald. Minor asbestos projects consist of repairing, abating, and encapsulating asbestos and ACM that pose an immediate threat to employees or the environment. These projects are addressed by a dedicated team of asbestos workers who are certified by the Ohio Department of Health and are trained in the other radiological, physical, and chemical hazards at the Fernald site. Asbestos containing materials on past projects have been packaged and shipped to the Nevada Test Site for disposal. However, disposition of these materials from

Fernald to Nevada has ceased due to a moratorium. The lifting of the moratorium and new technological alternatives for disposition are being pursued.

Several major asbestos removal projects have been initiated in 1993. These projects generally include repair or abatement to damaged transite panels and abatement of large volumes of pipe insulation, and are conducted by private contractors through a bid and award process. Examples include the following:

- Interior asbestos removal of Plant 7 (as part of building dismantling)
- West end of the extraction area (transite panels)
- Scrap pickling area in Plant 6 (transite panels)
- Digestion area in Plant 2/3 (transite panels)
- Power feeder cable removal (asbestos covered wire)

The determination of appropriate abatement involves a comprehensive evaluation of the hazards of the ACM and the other CERCLA hazardous substances within the particular facility. Friable material (material which can be easily crushed or crumbled by hand) with a significant hazard ranking is targeted for immediate abatement.

Most of the ACM at Fernald is non-friable asbestos (material which can not be easily crushed or crumbled by hand, such as transite), which is only a potential health hazard if it is disturbed by drilling, breaking or grinding. Non-friable asbestos is evaluated based on ongoing Health & Safety Hazard Assessments, the Operable Unit 3 Remedial Investigation/Feasibility Study (RI/FS), the Safe Shutdown Program and other Operable Unit 3 removal actions to determine whether abatement is appropriate and compatible with final remedial design for the operable unit.

Asbestos abatement activities are expected to continue up to, and possibly beyond, the Record of Decision for Operable Unit 3. Asbestos and ACM which do not pose an immediate threat will be addressed by the ongoing RI/FS process.

Once the determination of the appropriate action is made, the Hamilton County Department of Environmental Services is notified of all demolition and renovation activities, as prescribed. These notifications are made for all demolitions and renovations, regardless of size. This fulfills the reporting requirements of 40 CFR 61.145 and OAC 3745-20.

Special guidance is followed when large scale removal, demolition, or renovation projects involve more than 160 square feet or 260 linear feet of ACM. The major abatement projects require management oversight by Industrial Hygiene to ensure compliance with the removal and renovation requirements under USEPA, OSHA, the Clean Air Act and CERCLA regulations.

Training is an integral part of nearly every element of the Asbestos Program. All site personnel receive Asbestos Awareness training as part of the accredited sitewide training program developed to meet the requirements of OSHA. Additional OSHA training is provided, as required, for personnel directly involved with asbestos abatement activities, including crafts, asbestos abatement worker or supervisor training and certification.

A system for performing self-assessments and asbestos program evaluations pursuant to the DOE Self-Assessment Guidance Document has been instituted to ensure that training, program elements and site documents are kept current with new regulations or revisions to existing requirements. Audits along with other Asbestos Program quality assurance surveillance, are performed in support of this process. Audits are forwarded to the Environmental Protection Department, where plans to correct any problems are developed and managed.

Consistent with the provisions of the National Contingency Plan, removal actions will be appropriately integrated with the ongoing RI/FS to ensure that appropriate documentation is entered into the Administrative Record. All key program documentation is included in the Administrative Record file, which consists of current asbestos abatement removal action work practices and procedures and a compilation of appropriate material disposition records for ACM.

### **Overview of Community Concerns**

In preparing this addendum, transcripts of community meetings held on: January 31, 1989; May 15, 1989; October 24, 1989; February 20, 1990; May 22, 1990; September 25, 1990; December 11, 1990; March 19, 1991; July 16, 1991; October 29, 1991; February 25, 1992; July 21, 1992; November 9, 1992; February 23, 1993; and June 22, 1993 were reviewed. Also reviewed were transcripts from the RI/FS Environmental Impact Statement scoping meetings held on June 12 and 13, 1990.

A 30-day public comment period for the Asbestos Removals (Asbestos Program) Removal Action was held from July 7, 1993 to August 7, 1993. The announcement ran in three local newspapers. There were no oral or written comments submitted.

### **Highlights of Community Relations Activities**

Community concerns regarding the Asbestos Removals (Asbestos Program) Removal Action suggest an active FEMP community relations effort with the following objective:

- Maintain an active effort to keep interested community members informed throughout the implementation of the Asbestos Removals (Asbestos Program) Removal Action.

The following specific activities have been identified to support the community relations objective for this removal action:

1. Prepare one or more fact sheets or updates for the purpose of providing information about the removal action and answering key concerns about the Asbestos Program at the FEMP and distribute them at the public meetings.
2. Devote some portion of future community meetings to this issue; update the RI/FS exhibit to include new information as it becomes available. (Community meetings are held at regular intervals on dates selected by DOE.)
3. Include coverage about the Asbestos Removals (Asbestos Program) Removal Action in the Fernald Project Cleanup Report as needed during the removal action.
4. Offer a roundtable presentation on the Asbestos Program.
5. Provide a 24-hour phone line at the FEMP so concerned citizens can contact a FEMP representative during a time of alarm. The number is 513-738-6295, which is FEMP Security.
6. Make appropriate additions to the Administrative Record and publicize their availability at the Public Environmental Information Center, JAMTEK Building, 10845 Hamilton-Cleves Highway, Harrison, Ohio, 45030.

#### Timetable

The preparation of materials for all community relations activities will be tied to the removal action schedules. For a complete list of schedule dates and activities, please see the Asbestos Removals (Asbestos Program) Work Procedures are in the Administrative Record, located at the Public Environmental Information Center. The activities will be scheduled to provide the maximum flexibility and information to the public. The work plan for this removal action has been approved by EPA. Discussions and updates on the status of the removal action will be given at future public meetings.

**REFERENCES**

1. (the work plan and any other documents used for information)