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**ANNUAL UPDATE FOR ASBESTOS PROGRAM, REMOVAL ACTION  
NUMBER 26**

06/16/95

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REPORT



Department of Energy  
Fernald Environmental Management Project  
P. O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 648-3155

JUN 16 1995

DOE-1069-95

Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - 5HRE-8J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

ANNUAL UPDATE FOR ASBESTOS PROGRAM, REMOVAL ACTION NUMBER 26

This letter transmits an update of the Asbestos Program at the Fernald Environmental Management Project (FEMP). As discussed in our meeting of May 23, 1995, a summary document of the asbestos program would replace the annual updated compilation of work procedures. This change will result in a savings to the FEMP in both time and money while still providing your office with an annual update of the Asbestos Program. This documentation fulfills the requirement to provide annual updates by June 30, 1995, to the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) under terms of the Amended Consent Agreement for Removal Action Number 26.

If you have any questions, please contact John Trygier at (513) 648-3154.

Sincerely,

for Jack R. Craig  
Fernald Remedial Action  
Project Manager

FN:Trygier

Enclosure: As Stated

cc w/enc:

K. H. Chaney, EM-423/GTN  
J. McCloskey, EM-423/GTN  
B. Skokan, EM-423/GTN  
G. Jablonowski, USEPA-V, 5HRE-8J  
J. Kwasniewski, OEPA-Columbus  
P. Harris, OEPA-Dayton  
M. Proffitt, OEPA-Dayton  
S. McClellan, PRC  
R. Cohen, GeoTrans  
F. Bell, ATSDR  
R. Owen, ODOH  
AR Coordinator, FERMC0

cc w/o enc:

J. Fry, FERMC0/76  
R. D. George, FERMC0/52-2  
T. Hagen, FERMC0/65-2  
S. Houser, FERMC0/52-3  
K. Kolthoff, FERMC0/76  
C. Little, FERMC0  
M. Yates, FERMC0/9

**REMOVAL ACTION NO. 26**

**ASBESTOS PROGRAM SUMMARY**

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**ACRONYMS AND ABBREVIATIONS**

ACM	asbestos-containing material
AHERA	Asbestos Hazard Evaluation and Response Act
AHES	Asbestos Hazard Evaluation Specialist
AMC	Asbestos Management Committee
AMP	Asbestos Management Plan
CFR	Code of Federal Regulations
CRU	CERCLA/RCRA Unit
D&D	Decontamination and Dismantling
DOE	Department of Energy
FEMP	Fernald Environmental Management Project
GET	General Employee Training
HC-DOES	Hamilton County - Department of Environmental Services
IROD	Interim Record of Decision
MWO	Maintenance Work Orders
NEPA	National Environmental Policy Act
RD/RA	Remedial Design/Remedial Action
OAC	Ohio Administrative Code
ODOH	Ohio Department of Health
OEPA	Ohio Environmental Protection Agency
O&M	Operations & Maintenance
OU	Operable Unit
QA	Quality Assurance
U.S. EPA	United States Environmental Protection Agency

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**1.0 REMOVAL ACTION NO. 26, ASBESTOS PROGRAM SUMMARY**

**1.1 INTRODUCTION**

The May 19, 1992, submittal provided an overview of the policies and procedures governing the Fernald Environmental Management Project (FEMP) Asbestos Program. This submittal provides revised and updated documentation to support the Asbestos Program.

**1.2 ASBESTOS PROGRAM DESCRIPTION**

The FEMP Asbestos Program provides management, oversight, and support for activities involving asbestos-containing material (ACM) or are conducted in areas where ACM is located. The Asbestos Program is defined by an evolving Asbestos Management Plan (AMP) that focuses on worker protection, prevention of environmental emissions, and compliance with applicable regulations or legal agreements. An Asbestos Management Committee (AMC), with representatives from principal FEMP organizations involved in abatement activities, develops sitewide procedures, sets specific abatement and management goals, periodically evaluates progress toward these goals, and communicates corrective activities or general information to their respective organizations.

The Asbestos Program Coordinator is the chairman of the Asbestos Management Committee and reports to the FERMCO Manager of CERCLA/RCRA Unit 3 (CRU3), Environmental Projects. The Asbestos Program is managed within OU3, to ensure that the program is managed as part of the CERCLA multimedia (air, water, soil) environmental restoration of the FEMP.

The FEMP Asbestos Program (IM-6016) document, describes all phases and aspects of asbestos management at the FEMP. The "Program Administration" section describes the responsibilities necessary to support asbestos activities and projects. The "Control of Subcontractors" section describes the controls required by the various departments such as Health and Safety, Construction, and Operable Unit 3 (OU3) Environmental Projects. The "Personnel Training" section addresses regulatory driver requirements that define the needed training. The "Asbestos Program Quality Assurance Plan" (PL-3034) ensures the Asbestos Program maintains its objectives.

**1.2.1 Identification/Characterization of Asbestos-Containing Material (ACM)**

The first element of the Asbestos Program is to identify ACM at the FEMP. In February 1992, a site survey was completed by certified Asbestos Hazard Evaluation Specialists (AHES) contracted to perform an Asbestos Hazard Evaluation and Response Act (AHERA) based survey of the entire site.

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The original Asbestos Management Plan (AMP) (5/19/92) also provided a two step characterization of the ACM. Each homogeneous area was numerically prioritized to categorize the material for in-situ maintenance or removal.

Since Asbestos Program began in 1992, the following activities have taken place or are ongoing:

- 1,058 Maintenance Work Orders (MWO) have been written for asbestos demolition, abatement, or renovation through May 1995. Of these MWOs, 54% (577) have been completed.
- Asbestos abatement has been completed in the following buildings:
  - 3F - Harshaw Tower
  - 3E - Hot Raffinate Building
  - 3A - 2/3 Maintenance Building
  - 3D - NAR Tower
  - 26A - Fire Protection Pump House
  - 20B - Filter Chemical Building (part of Water Treatment)
- Ongoing site facility asbestos inspections (90 facilities inspected per year) and 200 MWOs written per year.

Outside pipe insulation is not accounted for within any of the buildings or site facilities. The quantity of outside pipe insulation is still being estimated and Work Orders prepared.

**1.2.2 Determining the Appropriate Action**

Determining the appropriate action (i.e., demolition, abatement, or renovation) involves a comprehensive evaluation of the hazards of the ACM and the other Comprehensive Environmental Response Compensation and Liability Act (CERCLA) hazardous substances within the particular facility.

Once the appropriate action has been determined, The Hamilton County-Department of Environmental Services (HC-DOES) is notified of all demolition, abatement, and renovation activities. Notifications are made for all demolitions, abatements, and renovations, regardless of size and fulfill the reporting requirements of 40 CFR 61.145 and OAC 3745-20.

**1.2.3 Asbestos Removal**

All Class I and II work is performed by Certified Abatement Workers or Ohio Department of Health (ODOH) licensed asbestos abatement contractors. When major removal projects such as Class I or Class II abatements, demolitions, or renovation are required, the following documents provide the necessary guidance and specifications:

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- "Construction Asbestos Abatement Procedure" (CT 4.2.1),
- "Asbestos Abatement Performance Specification,"
- Subcontractor Safety and Health (S&H) Asbestos Abatement Program (OS-ISH-001),
- Safety Performance Requirements Manual/Control of Asbestos Work" (RM-0021/SPR 12-1).

Also, the Asbestos Operations and Maintenance (O&M) manual provides guidance for minor removals. Interim storage of the removed ACM is addressed in the Waste Management procedure for "Packaging, On-site Movement, and Off-site Shipment of Material," (PP-0314).

**1.2.4 Asbestos Waste Management**

Removed asbestos waste is managed as part of the Waste Management Program at the FEMP, which is described in the annual compendium submittal to the U.S. EPA and OEPA for Removal Action No. 9 - Removal of Waste Inventories.

The "Construction Asbestos Abatement" (CT 4.2.1) and "Asbestos Operations and Maintenance Work Practices" (OM-0005) procedures provide guidance for the preparation of asbestos waste for management within the sitewide Waste Management Program.

**1.2.5 On-going Hazard Assessment**

During implementation of the Asbestos Program from identification to removal and final disposition of the ACM hazard under the Waste Management Program, the condition and potential for disturbance of the asbestos material requires periodic surveillance and assessment. This is implemented through the "Walk Through Inspection of ACM," EP:EFM-003.

**1.2.6 Current Plans**

The existing work orders will be reviewed and prioritized. The work orders will be screened to identify those that do not fall into a specific Decontamination and Dismantling (D&D) project, but are health and safety related. Specific D&D projects that have asbestos components (i.e., Plant 4) will integrate asbestos work into the project. All work orders which have specific health and safety concerns will be completed. Asbestos removal will occur along with management and disposition of hazardous material.

DOE Order 5480.1B states that potential ACMs should be routinely investigated and managed. It also states the type of Industrial Hygiene Program required to ensure compliance with CERCLA, National Environmental Policy Act (NEPA), and other environmental requirements.

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**1.2.7 Training**

Training is an integral part of the Asbestos Program. General Employee Training (GET), per OSHA 1910.120, is administered by the Training Department of the Administrative Division. Site Worker training is provided to employees who may encounter asbestos in the performance of their assignments.

For FY 95 there are six training sessions scheduled for asbestos removal supervisors and workers. Four training sessions were completed and two training sessions, a five day supervisor training and a four day worker training, will be completed by the end of FY 95.

**1.2.8 Quality Assurance**

Quality Assurance (QA) support systems are designed to ensure that all the ACM regulatory requirements, Asbestos Program site procedural requirements, and related hazardous material requirements are communicated, implemented correctly, and updated to represent the most accurate information available.

The "Quality Assurance Program Description" (RM-0012), is the foundation QA document on-site. The Asbestos Program complies with the requirements of this document by following site policies and procedures. Specific QA Asbestos Program activities are contained in PL-3034, "Asbestos Program Quality Assurance Plan."

**1.3 INTEGRATION WITH OPERABLE UNIT 3 (OU3)**

**1.3.1 General Information**

Implementation of Asbestos Program activities supports OU3 remedial objectives by preparing areas for remediation. Asbestos Program actions are consistent with final remedial actions because mitigation of personnel/environmental risk, and safe, permanent disposition of FEMP wastes/materials are the ultimate goals.

**1.3.2 Long Term Plans**

The long term approach and schedule for the dismantlement of structures under the OU3 Record of Decision for Interim/Remedial Action (IROD) have been documented in the "OU3 Remedial Design/Remedial Action (RD/RA) Work Plan" for Interim/Remedial Action (Final, March 1995) and the "OU3 Remedial Design Prioritization and Sequencing Report" (Draft, March 1995).

As specified in the Operable Unit 3 (OU3) Remedial Design/Remedial Action (RD/RA) Work Plan for Interim Remedial Action, asbestos removal activities will be performed prior to structural dismantlement.

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1.4 PROCEDURES AND DOCUMENTS REGULATING REMOVAL ACTION NO. 26

At this time, there are no Asbestos Program changes. The following procedures and documents comprise the FEMP Asbestos Program and are available upon request:

FEMP ASBESTOS CONTROL PROGRAM	IM-6016
ASBESTOS CONTROL POLICY	PO 1003
ASBESTOS MANAGEMENT COMMITTEE	CH 2005 Rev. 1
ASBESTOS MANAGEMENT PLAN	PL 3018 Rev. 1
ASBESTOS SURVEY & ASSESSMENT	FEBRUARY, 1992
WALK THROUGH INSPECTIONS FOR ACM	EP:EFM-003
CONSTRUCTION ASBESTOS ABATEMENT	CT 4.2.1.
PERFORMANCE SPECIFICATIONS, ASBESTOS ABATEMENT TRANSITE REMOVAL	01516 07415
ISSUING PERMITS FOR ASBESTOS WORK	OS-ISH-001
MODEL CONSTRUCTION SUBCONTRACT PART 8, SAFETY & HEALTH REQS.	ASBESTOS ABATEMENT
ASBESTOS OPERATIONS & MAINTENANCE WORK PRACTICE	OM 0005
CONTROL OF ASBESTOS WORK	RM-0021/SPR-12-1
PACKAGING OF ABATED ASBESTOS MATERIALS	PP 0314
MANAGEMENT OF HAZARDOUS WASTE	FMPC 0519
ASBESTOS PROGRAM QUALITY ASSURANCE PROGRAM	PL-3034
TRAINING PROGRAM MATRIX	
SITE DOCUMENTATION SYSTEM	PP 0103
DEVIATION & CORRECTIVE ACTION REPORTING	SSOP 0023
TRAINING DEPARTMENT PROGRAM MANUAL	RM 0002

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QUALITY ASSURANCE PLAN	RM 0012, Rev. 3
SITE HEALTH & SAFETY PROGRAM	RM 0021
FEMP RESPIRATORY PROTECTION MANUAL	RM-0007
FERMCO RADIOLOGICAL CONTROL REQUIREMENTS MANUAL	RM-0020
CONTROL OF PERMITS FOR ACCOMPLISHING HAZARDOUS WORK	FMPC 516

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