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APR 13 2004

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0226-04

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

Dear Mr. Saric and Mr. Schneider:

**REVISED PLACEMENT OF ASBESTOS CONTAINING MATERIAL IN SEALAND CONTAINERS**

- References:
- 1) Letter DOE-0208-04, W. Taylor to J. Saric and T. Schneider, "Placement of Asbestos Containing Material in Sealand Containers," dated March 19, 2004
  - 2) Letter, J. Saric to J. Reising, "ACM and Addendum 2 to OSDF IMPP," dated March 23, 2004
  - 3) Letter, T. Schneider to W. Taylor, "Conditional Approval to Place Bagged ACM from ROBs into OSDF," dated March 23, 2004

The purpose of this letter is to formally document and request your approval of an improved approach currently being applied to unload and place bagged asbestos containing material (ACM) in the On-Site Disposal Facility (OSDF) from loosely packed sealand containers. Significant improvements have been incorporated into the previously approved approach (References 1, 2, and 3) with additional input from the Ohio Environmental Protection Agency (OEPA) based on field experiences obtained in the last few weeks. Actual field demonstrations, as observed by OEPA, have shown that this improved approach will protect the workers and the environment and can be done reasonably efficiently. The enclosure to this letter includes detailed steps of the approach.

DOE will also follow a similar process to develop an approach more suitable for handling those tightly packed sealand containers in the near future.

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Mr. James A. Saric  
Mr. Tom Schneider

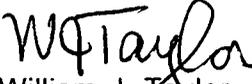
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DOE-0226-04

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

FCP:Reising

  
William J. Taylor  
Director

Enclosure: As Stated

cc w/enclosure:

N. Akgündüz, OH/FCP  
D. Pfister, OH/FCP  
J. Reising, OH/FCP  
G. Jablonowski, USEPA-V, SR-6J  
M. Cullerton, Tetra Tech  
F. Bell, ATSDR  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

K. Johnson, OH/FCP  
K. Badu-Tweneboah, GeoSyntec, MS38  
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T. Hagen, Fluor Fernald, Inc./MS1  
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D. Powell, Fluor Fernald, Inc./MS64  
C. Van Arsdale, Fluor Fernald, Inc./MS64  
B. Zebick, Fluor Fernald, Inc./MS60  
ECDC, Fluor Fernald, Inc./MS52-7

***Placement Approach of Bagged Asbestos Containing  
Material (ACM) from Loosely Packed Sealand Containers***

- 1) Sealand containers contents will be inspected by process knowledge (pictures) or boxes will be opened prior to moving to be unloaded in the cell. Inspection (opening) of the boxes will take place in the On-Site Disposal Facility (OSDF) Material Transfer Area (OMTA) Box Storage Area.
- 2) If the container can be manually unloaded by asbestos competent workers by safely entering the container, the box will be loaded onto a flatbed truck and transported to the disposal site. If the box is stacked too high to safely enter the container manually, it will be marked and set aside to remove contents by other methods at a later date. A separate plan will be written to mechanically empty any container.
- 3) A pre-approved grid will be chosen and a barricade installed around this grid to keep anyone from entering the area. All asbestos placement is planned to be in Cell 6 away from any other work activities.
- 4) Upon arrival at the cell, the truck will be staged on the haul road or a pre-constructed level pad by the catchment area. There could be up to four unloading operations inside of two different grids going on at any given time.
- 5) The asbestos competent workers will access the flatbed with a ladder to open the box.
- 6) Upon entry of the box, a loader will proceed to the edge of the flatbed and the workers will manually load the loader bucket with the ACM bags and any lining material used inside the container. If any pipes are encountered in a container, they can be placed but need to be loaded into the loader separately from other bags to prevent punctuating any bags. If piping/bags is too heavy to manually lift a "Lull" type machine will be used to remove the pipe/bag.
- 7) The loader will proceed to the placement grid and carefully place the material at proper location in the grid. No further movement of the material should be required.
- 8) After the box is emptied, asbestos competent workers will dry vacuum the interior of the box and spray lockdown with a garden sprayer or airless type sprayer before leaving the unloading station. If the asbestos competent worker or supervisor determines that the container needs washing, the box will be sent to a remote part of the OSDF by the catchment area and sprayed with a fire hose or water truck. When the interior of the box is wet and cannot be sprayed with lockdown the box will be sent back to the container area and sprayed with lockdown when dry.
- 9) The doors of the container will be closed and the box sent to a staging area for Quality Control inspection.
- 10) As unloading activities progress for the day, the ACM will be covered with soil according to the Addendum 2 of Impacted Material Placement Plan. The grid will also be managed and covered in a manor so that if inclement weather arises the grid can be covered in a timely manor prior to exiting the cell.

As warmer weather arrives a heat stress station will be installed next to the unloading area.