

Asbestos



96-RF-01648

March 15, 1996

96-RF-01648

DIST.	LTR	ENC
BENSUSSEN, STAN		
BUHL, TONY	X	
CARD, BOB		
MANI, VIK		
MARTINEZ, LEN		
MCANALLY, JIM		
MCKAY, BOB		
O'BRIEN, GEORGE		
TUOR, NANCY		
VOORHEIS, GARY	X	
WALLER, GAIL	X	
Gilmerin, J. T.	X	
Kell, R. E.	X	
Spears, M. S.	X	
JAUSSEN, B.H.	X	
COLE, G.	X	
PHILLIPS, F.	X	
LEE, C. B.	X	
Sheehan, K.P.	X	

David A. Brockman  
Assistant Manager  
Strategy, Integration and Guidance  
DOE, RFFO

ABATEMENT OF ASBESTOS MATERIAL - VM-074-96

- Refs: (a) Colorado Air Quality Control Commission; Regulation No. 8, Emission Standards for Asbestos  
(b) 29 CFR 1926, Safety and Health Regulations for Construction  
(c) 40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants (NESHAPS)

The repair, maintenance, removal and disposal of asbestos containing material at the Rocky Flats Environmental Technology Site (Site) are accomplished in accordance with the requirements of references (a) through (c). Reference (a), Colorado Regulation 8, differentiates between public access areas and non-public access areas by specifying asbestos abatement work practices for public access areas. Per DOE-RFFO verbal direction, buildings and facilities at the Site have been considered public access areas for asbestos abatement which may have resulted in abatement activities being conducted under more stringent work control practices than is necessary or required by regulation.

Colorado Regulation 8 defines a public access area as follows:

*"Area of Public Access means any building, facility, or property, or only that portion thereof, which any member of the general public can enter without limitation or restriction by the owner or lessee under normal business conditions; except that "Area of Public Access" includes any facility which charges the general public a fee for admission such as any theater or arena. "General Public" does not include employees of the entity which owns, leases, or operates such building, facility, or property, or such portion thereof, or any service personnel or vendors connected therewith."*

Based on this definition, Site buildings, facilities and properties within the confines of the east and west access gates are non-public access since no member of the general public can enter the Site without limitation or restriction. Therefore, the applicable asbestos abatement work practices and procedures specified in references (b) and (c) would apply. Unless otherwise directed in writing by DOE-RFFO, Kaiser-Hill will consider all buildings, facilities and properties within the east and west gate accesses to be non-public access for the purpose of asbestos abatement.

CORRES. CONTROL	X	X
ADMIN RECD/080		
RAFFIC		
ATS/T150G		

CLASSIFICATION:	
CNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE:

M.D. Sheehan  
DATE: 3-15-96

REPLY TO RFP CC NO.:

ACTION ITEM STATUS:  
 PARTIAL/OPEN  
 CLOSED

LTR APPROVALS:

FIG. & TYPIST INITIALS:  
JTG:mmc  
16469 (Rev. 4/25/95)

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 Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

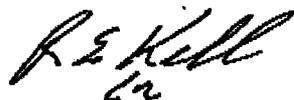
ADMIN RECORD

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Additionally, the State of Colorado Department of Public Health and Environment (CDPHE) has reportedly classified all asbestos containing suspended ceiling tile as friable material. The automatic classification of suspended ceiling tile as friable is not specified in federal or local regulations, including Colorado Regulation 8. This interpretation could result in excessive requirements for materials that in fact do not meet the definition of friable. DOE-RFFO is requested to confirm the classification of asbestos containing suspended ceiling tile with CDPHE and clarify under what circumstances such ceiling tile may be considered non-friable.

Questions concerning this memorandum can be directed to J. T. Gilmartin of my Industrial Hygiene, Occupational and Chemical Safety staff at Extension 2563.



V. Mani  
Vice-President  
Safety, Engineering and Technical Services

JTG:mmc

Orig. and 1 cc - D. A. Brockman