

Internal Letter



Rockwell International

Date . February 22, 1989

No. . ASBESTOS.BKG

TO (Name, Organization, Internal Address)
· G. H. Setlock
· HS&E Environment and Health
· Building 250

FROM (Name, Organization, Internal Address, Phone)
· B. K. Greer
· RCRA/CERCLA Program
· Building 250
· 7264

SUBJECT · ASBESTOS DISPOSAL AT THE ROCKY FLATS PLANT

The draft procedure HS&E 21.03 Asbestos Disposal has been reviewed by RCRA/CERCLA Programs. Some revision is required before the policy can be implemented by March 1, 1989 to close the 1986 Environmental Survey finding.

RCRA/CERCLA Programs have assumed program management responsibility for Toxic Substance Control Act (TSCA) compliance. This responsibility includes development and coordination of all TSCA related procedures and activities. The need for functional organizations to conduct and accomplish appropriate actions to comply with established TSCA Rockwell policies has not changed. By assuming program management responsibility for TSCA compliance, RCRA/CERCLA Programs will assure that the TSCA program, including asbestos disposal, receives the attention it should. This relieves a potential RFP vulnerability.

Listed below is a modified list of the actions underway or planned which need to be completed before the procedure HS&E 21.03 Asbestos Disposal can be implemented.

1. Environmental Management will review the revised draft procedure and return any comments immediately so the procedure can be implemented quickly. Generator responsibilities have been added to the procedure.
2. RCRA/CERCLA Programs will obtain appropriate approvals and publish the procedure. In the future, asbestos disposal procedures will be included in the TSCA Standard Operating Procedure Manual which is being written.
3. Environmental Management will have the signs that were ordered placed around historic and current disposal areas. RCRA/CERCLA Programs will establish maintenance plans for the signs.
4. Approval on all Waste Processing Request Forms for asbestos disposal will come from Environmental Management.

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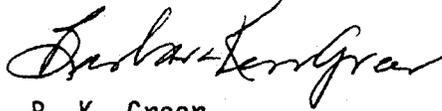
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ADMIN RECORD

A-0007-000496

5. Plant Services will conduct daily inspections and maintain bound log books of asbestos disposal data. Environmental Management will perform periodic inspections of the asbestos disposal to be carried out on a weekly to monthly basis and the results will be recorded. This is an important step in Rockwell's past and continued compliance with TSCA.

Rick Lawton and I have discussed these changes to the procedure. We have agreed that they are appropriate. If you have further questions please call me on extension 7264.



B. K. Greer
RCRA/CERCLA Program

Enc.

cc:

F. D. Hobbs
M. W. Jones
F. P. Lawton
T. F. Lewis
K. B. McKinley

Scope

This document describes the requirements for transportation and disposal of asbestos containing material in the landfill.

1. Definition
 - 1.1 Asbestos Containing Material - Includes both friable and non-friable asbestos forms, containing at least 1% asbestos.
2. Responsibilities
 - 2.1 *RCRA/CERCLA Programs is responsible for:*
 - * *Tracking locations of past and present disposal sites.*
 - * *New asbestos disposal site placement.*
 - * *Training.*
 - 2.2 *The Environmental Management Group is responsible for:*
 - * *Maintenance of written record.*
 - * *Inspection and Enforcement.*
 - * *Maps of locations of past and present disposal sites.*
 - 2.3 *Plant Services is responsible for:*
 - * *Proper disposal practices including transportation.*
 - * *Maintaining daily disposal logs.*
 - 2.4 *The Generator is responsible for:*
 - * *Initiating Waste Processing Request Forms.*
 - * *Proper packaging of asbestos-containing waste.*
3. Requirements
 - 3.1 All asbestos containing material waste shall go to the designated asbestos disposal site which shall be segregated from the sanitary landfill waste. RCRA/CERCLA will designate the site.
 - 3.2 *All asbestos containing material waste must be sealed in bags or containers by the generator.* Broken or torn bags or containers must be placed inside new containers or bags before disposal.
 - 3.3 During transport, all asbestos waste contained in sealed bags or containers must be placed in drums or wooden, metal or glass fiber boxes and covered.
 - 3.4 The asbestos disposal area shall be clearly delineated by warning signs. Maps of the locations of past and present disposal sites shall be maintained by Environmental

Management. Copies of these maps will be located with Environmental Management, RCRA/CERCLA Program, and Plant Services.

- 3.5 *Plant Services will place containers or bags containing asbestos material carefully into the disposal excavation to avoid breaking the containers*
- 3.6 *Plant Services will place fresh soil cover on the asbestos each day that the asbestos disposal site is used to completely cover the disposed waste. This cover shall be a minimum of 6 inches in depth.*
- 3.7 *Plant Services will maintain a bound log book documenting the number of containers disposed and the signature of the operator verifying that the waste material has been covered. This daily log should also note conditions of the excavation; such as, standing water and approximate remaining capacity.*
- 3.8 *Environmental Management will periodically and routinely inspect the disposal of asbestos waste to ensure compliance with this procedure. Records of inspection, maps, and copies of the daily log will be maintained by Environmental Management.*
- 3.9 *Training of Plant Service personnel will be conducted by RCRA/CERCLA in the proper disposal of asbestos containing material.*

4. References

Clean Air Act, 42 USC 1857 - 18571.
Colorado Air Pollution Control Act.
Toxic Substance and Control Act

Contact Organization: RCRA/CERCLA Program