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WELDON SPRING SITE REMEDIAL ACTION PROJECT  
 MK-FERGUSON CO., INC. WO 3589 (314) 441-8086  
 7295 Highway 94 South  
 St. Charles, MO 63303

Document Number: 10156

Document Type: LR-DCUW-EPA

Originators DCN: \_\_\_\_\_

SUBJECT Quarry Activities Remedial and Storage

AUTHOR DMcCracken, JH TO Wall, D DATE 3/24/92

SUBJECT CODE/WORK PACKAGE NUMBER 35010

REFERENCED DOCUMENT(S) 15663, 15664

THIS IS A RESPONSE TO COMMUNICATION NUMBER \_\_\_\_\_ DATED \_\_\_\_\_

ACTION ITEM TRACKING

INITIATE ACTION ITEM

INDIVIDUAL ASSIGNED TO ACTION \_\_\_\_\_ DEPARTMENT \_\_\_\_\_

ACTION REQUIRED \_\_\_\_\_

DUE DATE 1/1 ACTION ITEM LOG NUMBER \_\_\_\_\_

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY? \_\_\_\_\_

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO  YES \_\_\_\_\_

ACTION ITEM LOG NUMBER \_\_\_\_\_ CLOSING DOCUMENT DIN \_\_\_\_\_

COMPLETION DATE \_\_\_\_\_ APPROVAL \_\_\_\_\_

COMMENTS \_\_\_\_\_

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Mr. Dan Wall  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. Wall:

**QUARRY ASBESTOS REMOVAL AND STORAGE**

During the excavation and removal of the bulk waste from the quarry at the Weldon Spring Site Remedial Action Project, we expect to encounter asbestos and/or asbestos-containing material (ACM) in varying amounts and sizes. The Department of Energy wishes to clarify quarry asbestos removal operations under the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations.

The Record of Decision for the Management of the Bulk Wastes at the Weldon Spring Quarry (QY ROD) states that the NESHAP requirements for asbestos (40CFR 61, Subpart M) are "applicable for all phases of the action" (removal, transfer, and storage). Due to the nature of the operation and type of ACM to be found, we believe that some phases of the "asbestos removal" may not fully comply with the NESHAP requirement since full compliance may generate increased worker safety risks.

The NESHAP requirement states that no visible emissions may be discharged to the outside air during collection, processing, packaging, transporting, or deposition of any asbestos-containing waste material. The regulation further requires that the asbestos-containing waste material be mixed with water or other wetting agents and sealed in labeled, leak-tight containers while wet.

Any asbestos found in the quarry during excavation is expected to be mixed with other debris and soil. Segregating the asbestos may be difficult to accomplish depending on the condition and size of the material. The asbestos will be separated from other equipment or debris if it can be handled by conventional excavation equipment and measures larger than 2'x 2'x 2" (i.e., about one cubic foot in size). The larger pieces of asbestos will be wetted and placed in nearby roll-off containers and covered (and tightly sealed). The roll-offs will then be transferred to the Temporary Storage Area (TSA). These containers will meet EPA requirements for ACM waste containers.

CONCURRENCES	
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Quarry Asbestos Removal  
and Storage

Smaller pieces of asbestos will not be segregated because of the inherent worker safety risks and exposures that would be involved during the tedious hand labor required for removal. The small pieces of asbestos, which will be mixed with soil and debris, will be transported in covered trucks to the TSA. Debris piles at the TSA will be covered or sprayed with foam, roped off, and designated as an asbestos storage area. Any asbestos in these piles will not be sealed in leak-tight containers as required under NESHAPS.

REFERENCES  
RTG SYMBOL  
EW-94  
INITIALS/SIG  
AGibson  
DATE 3/19/92

This method of collection, transfer, and storage will still protect health and the environment as required under Section 121. The workers involved in the removal of the bulk waste will be wearing respirators that will filter out any asbestos fibers. In addition, environmental air sampling will be conducted in order to verify adequate excavation, transportation, and storage procedures for asbestos contaminated debris and soil.

RTG SYMBOL  
EW-94  
INITIALS/SIG  
J. McCracken  
DATE 3/19/92

The DOE plans to proceed with the asbestos removal and storage methods as explained above. We believe that an ARAR waiver may not be required since the proposed activity does not affect final cleanup criteria or impact the ability to protect health and the environment. I have enclosed for your use position/interpretation summary.

RTG SYMBOL  
EW-94  
INITIALS/SIG  
S. McCracken  
DATE 3/21/92

If you have any questions, please contact Alan D. Gibson at (314)441-8978.

Sincerely,

Stephen H. McCracken  
Project Manager  
Weldon Spring Site  
Remedial Action Project

Enclosure:  
As stated

cc w/enclosure:  
Mary Gilbert, PMC  
Dave Bedun, MDNR

EW-94:AGibson:x850:emh:3/19/92 (m:QuarAss.let)

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