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West Valley Demonstration Project

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ASBESTOS MANAGEMENT PLAN

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ASBESTOS MANAGEMENT PLAN

1.0 PURPOSE

This management plan defines the requirements to limit the exposure of WVDP personnel to asbestos fibers in the work place and to define the requirements for asbestos abatement projects.

2.0 SCOPE

2.1 Asbestos products, particularly insulation and transite board, when cut, crushed, ripped, etc. may cause airborne concentrations of asbestos fibers. Exposure of employees to airborne concentrations of asbestos fibers, air pollution with asbestos fibers, and improper disposal of asbestos shall be prevented.

2.2 This Asbestos Management Plan was prepared using EPA 40 CFR 763 subpart E, Asbestos Hazard Emergency Response Act (AHERA), as a guideline. The requirements used in establishing the WVDP Asbestos Management Plan are in accordance with DOE Guidelines, OSHA 29 CFR 1910.1001 & 29 CFR 1926.1101, and 12 NYCRR Part 56.

3.0 DEFINITIONS

3.1 Asbestos

Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered or any combination of these minerals.

3.2 Asbestos-Containing Material (ACM)

Any material or product which contains more than one percent asbestos.

3.3 Asbestos-Containing Building Material (ACBM)

Surfacing ACM, thermal system insulation ACM, or miscellaneous ACM found in or on interior structural members or other parts of a building.

3.4 Demolition

The wrecking or removal of any load-supporting structural member of a facility together with any related handling operations.

3.5 Emergency Renovation Operation

A renovation operation that was not planned. This renovation results from a sudden, unexpected event that, if not immediately attended to, may present a safety or public health hazard. This term includes operations required by failure of equipment.

3.6 Fiber

A particulate form of asbestos, five micrometers or longer, with a length-to-diameter ratio of at least three to one.

3.7 Fiber Release Episode

Any uncontrolled or unintentional disturbance of ACM resulting in fiber counts above background.

3.8 Friable

Materials that when dry may be crumbled, pulverized, or reduced to powder by hand pressure.

3.9 Functional Space

A room, a group of rooms, or a homogeneous area (including crawl spaces or the space between a dropped ceiling and the roof deck) such as office(s), a cafeteria, laboratory hallway(s), designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

3.10 High-Efficiency Particulate Air (HEPA)

A filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles which are 0.3 microns in diameter or larger.

3.11 Homogeneous Area

An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

3.12 Major Fiber Release Episode

The falling or dislodging of more than 3 square or linear feet of friable ACM.

3.13 Minor Fiber Release Episode

The falling or dislodging of 3 square or linear feet or less of friable ACM.

3.14 Miscellaneous Material

Interior building material on structural components or structural members of fixtures, such as floor and ceiling tiles. This does not include surfacing material or thermal system insulation.

3.15 Nonfriable

Material which when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

3.16 Operations and Maintenance Program

A program of work practices to maintain friable ACM in good condition, ensure clean up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACM disturbance or damage.

3.17 Planned Renovation Operations

A renovation operation, or a number of such operations, in which some ACM will be removed or stripped within a predictable period of time.

3.18 Potential Damage

Circumstances in which:

3.18.1 Friable ACM is in an area regularly used by building occupants, including maintenance personnel, during their normal activities.

3.18.2 There are indications that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

3.19 Potential Significant Damage

Circumstances in which:

3.19.1 Friable ACM is in an area regularly used by building occupants, including maintenance personnel, during activities.

3.19.2 There are indications that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

3.19.3 The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

3.20 Renovation

Altering a facility or one or more facility components in any way, including the stripping or removing ACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

3.21 Routine Maintenance Area

An area, such as a boiler room or mechanical room, that is not normally frequented by occupants and in which maintenance employees or contract workers regularly conduct maintenance activities.

3.22 Surfacing Material

Material in a building that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceiling and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

3.23 Thermal System Insulation

Material in a building applied to pipes, fittings, boilers, breaching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

4.0 RESPONSIBILITIES

4.1 Asbestos Management Working Committee

4.1.1 The Asbestos Management Working Committee is composed of personnel from Plant Engineering, Radiation Protection, Health Services, Environmental Affairs, Waste Management Operations, Industrial Hygiene & Safety, Maintenance, and Project Appraisals. The committee handles asbestos issues and concerns as required, and is responsible for formulating and managing the Asbestos Management Plan. Elements of this plan include: 1) compliance with federal, state and local rules and regulations regarding asbestos; 2) O&M program and standard operating procedures (SOP's); 3) reinspection of locations with ACM, labeling ACM and posting areas with ACM, and inventory of ACM at WVDP; 4) information and training to employees in the hazards associated with exposure to asbestos; 5) air sampling following federal, state and local rules and regulations, and 6) medical surveillance.

4.2 Asbestos Program Manager

4.2.1 Ensures that asbestos inspections, reinspections, development and updating of the WVDP Asbestos Management Plan, and the development and implementation response actions are carried out in accordance with applicable regulations and WVDP standard operating procedures (SOPs).

4.2.2 Ensures that the Asbestos Management Plan is available for inspection and that notification of such availability has been provided to interested parties.

4.2.3 Ensure, where feasible, that warning labels are attached immediately adjacent to ACM, that the areas with ACM are posted, or that a combination of labels and postings are used in routine maintenance areas and at entrances of areas listed in Section 5 of this plan.

4.3 Medical Personnel

4.3.1 Administer a medical surveillance program per WVDP-026, "The Occupational Health Manual", for employees that are exposed to airborne concentrations of asbestos at, or above, the current OSHA Permissible Exposure Limit (PEL) as a normal part of their jobs (asbestos workers & handlers) or employees who are required to wear negative pressure respirators while working with asbestos.

4.3.2 Provide medical assessment under the supervision of a licensed physician to employees having the potential to be exposed to airborne concentrations of asbestos at, or above, the Permissible Exposure Limit (PEL) at the following times:

A. Prior to the assignment to an occupation where an employee is exposed to airborne concentrations of asbestos,

B. Annually following the initial exposure,

C. Within 30 calendar days of the termination date of employment.

4.3.3 Maintain medical surveillance records per WVDP-026, Appendix 5 for each employee for the duration of employment plus 30 years.

4.4 Industrial Hygiene & Safety Department

4.4.1 Recommend appropriate type of HEPA filtered respirators to be used by employees that may be exposed to asbestos fibers during asbestos remediation projects at WVDP.

4.4.2 Provide air monitoring as required for minor, small and large scale asbestos abatement projects and as directed by the asbestos program manager.

4.4.3 Approve industrial work permits (IWPs) for clean ups, routine maintenance, minor, small and large scale asbestos abatement projects.

4.4.4 Maintain, and update as required, an air sampling data base of all asbestos projects performed at WVDP. Use the information on this air sampling data base to conduct OSHA's Initial and Negative Exposure Assessments (IEA and NEA respectively) for any one specific asbestos project.

4.5 Radiation Protection Personnel

4.5.1 Approve radiation work permits (RWPs) when asbestos work is conducted in areas that may contain radioactive material.

4.5.2 Perform radiological surveys as required for minor, small and large scale asbestos abatement projects and as requested by the Asbestos Program Manager.

4.5.3 Perform quantitative and qualitative respirator fit test prior to first use and at least every six months thereafter per FHS-IH-3.

4.6 Asbestos Inspectors

4.6.1 At least once every three years after this management plan is in effect, visually reinspect and reassess the condition of all confirmed or assumed ACM. Evaluate ACM that was previously assessed as nonfriable to determine whether it has become friable. Identify any suspect materials that were not previously addressed, collect samples, and assess their condition. Record any change in conditions or quantities of ACM on the field forms (example in Attachment B) of the inspection report.

4.7 Asbestos Handlers

4.7.1 Perform operations and maintenance activities, and minor, small or large asbestos projects in accordance with this Asbestos Management Plan, WVNS SOPs and Work Orders, and in accordance with applicable regulation.

4.7.2 Provide response actions to fiber release episodes as described in Section 6.0 of this management plan.

4.8 Asbestos Supervisors

4.8.1 Ensure that operations and maintenance activities, minor, small or large asbestos abatement projects are carried out in accordance with applicable regulations and WVNS SOPs and Work Orders.

4.8.2 Obtain necessary IWPs and Radiation Work Permits (RWPs) for operations and maintenance activities and asbestos abatement projects.

4.9 Training Coordinator

4.9.1 Arrange asbestos awareness training to any maintenance or custodial workers who work in areas containing ACM.

4.9.2 Arrange 32 hour asbestos handler training for workers who may disturb asbestos.

4.9.3 Arrange training necessary for asbestos supervisors and asbestos inspector/management planners, project managers, project designers and air sampling technicians.

FC1> 4.9.4 Transmit records to Records and Configuration/Document Control and arrange necessary refresher training.

4.10 Waste Management Operations

4.10.1 Do abatement work, package, store and/or dispose of asbestos in accordance with this document, applicable WVNS documents and applicable regulations.

4.11 Environmental Affairs

4.11.1 Provides interpretation of all applicable codes and regulations and ensures that all ACM is handled and disposed of in accordance with all federal, state and local regulations.

4.11.2 Inform Asbestos Management Working Committee and appropriate site personnel with new or revised codes and regulations applicable to WVNS Asbestos Program.

4.11.3 Prepare and submit notifications of asbestos projects to regulatory agencies as required.

4.11.4 Contact appropriate agencies as required.

5.0 GENERAL INFORMATION

Asbestos is a naturally occurring mineral. The widespread use of asbestos as a building, insulation, and sound barrier material in industrial applications coupled with the potential serious health hazards from exposure to airborne asbestos fibers poses environmental and occupational health concerns for WVDP employees and subcontractors.

This Management Plan provides general practices to be followed in addressing asbestos related problems while ACM is present at WVDP. The specifics of asbestos abatement are contained in WVNS SOPs 15-44 "Asbestos Removal - Minor Projects" and 15-55 "Asbestos removal - Small and Large Projects".

5.1 Management Plan Introduction

5.1.1 Procedures

Based on the conditions found during the inspection and asbestos content confirmed by the laboratory analysis, specific asbestos remediation response actions were selected for each space. Asbestos remediation is generally approached in one of five ways: operations and maintenance, repair, enclosure, encapsulation, or removal. Each approach is evaluated for its potential to avoid and/or alleviate any problems and to achieve compliance with the applicable regulations. The selected options are also weighed in terms of their cost effectiveness and feasibility. The need to implement any of the alternatives is based on the evaluation of the existing situation using the following criteria: exposure risk, cost, and acceptability. Sometimes a combination of the five remediation options may be the best way to achieve compliance and a safe work environment. A discussion of the remediation options is presented below.

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WARNING

All roofing material, and all other materials, which could possibly contain asbestos shall be assumed to be ACM and shall be treated as ACM unless bulk sample and analysis, or process knowledge, determines otherwise.

FC2> **NOTE** *Because of the destructive nature of bulk sampling, not all roofing material has been bulk sampled. Bulk sampling of roofing material has been performed on damaged roofs and/or roofs that have been identified for repair and/or replacement. Thus, any roof in good condition will be bulk sampled only when it will/may be disturbed (disrupt the roofing material matrix by cutting, abrading, etc.) in any way.*

5.1.2 Response Actions

Operations and Maintenance (O&M) is a set of internally developed measures specifically designed to prevent the disturbance of existing asbestos-containing materials. Areas to be included in an O&M plan are:

- Maintenance Worker Awareness Training
- In-House Response Team Training
- Asbestos Labeling Program (See Attachment G)
- Yearly background air sampling

Operations and maintenance is usually selected where the asbestos material is undamaged; there is no evidence of an existing or past problem; and a low likelihood of future problems exists. As with all options except removal, operations and maintenance only postpones removal until some later date or until demolition of the building.

Repair is corrective action using required work practices to control fiber release from damaged areas.

Enclosure is building a physical barrier around the asbestos. A proper enclosure would be air or dust tight. Thus, enclosure is appropriate only when it is feasible to permanently eliminate access to the space around the asbestos material. This action is not often used because access is typically necessary to maintain asbestos-insulated utility items.

Encapsulation is the name for using a chemical sealant to contain the asbestos fibers in a fixed matrix. Encapsulation can be appropriate where the asbestos material is firmly adhered to the surface and when there is little risk of physical disturbance that might cut into the asbestos deeper than the encapsulant had penetrated. The shortcomings of encapsulation are that the material may still be disturbed, that fibers may be released when the material is impacted, and that the weight of the encapsulant can cause premature failure of the material (particularly for encapsulation of sprayed-on materials). Encapsulation is also a disruptive process which may require the same closure of the area and the same temporary displacement of activities as required for by removal of the ACM. Because of the time and labor involved in preparing and cleaning a job site for encapsulation, the construction cost can be nearly as high as the cost of removal. Further, removal would still be required at the time of demolition and would likely be more difficult for encapsulated materials.

Removal is used when the asbestos is friable or damaged and must be physically removed from the premises. Removal is the only permanent solution and can be accomplished safely when carefully planned and executed. However, removal may be expensive and may require displacement of personnel and functions. Removal of all asbestos containing material is required prior to demolition of any building.

5.1.3 Priorities

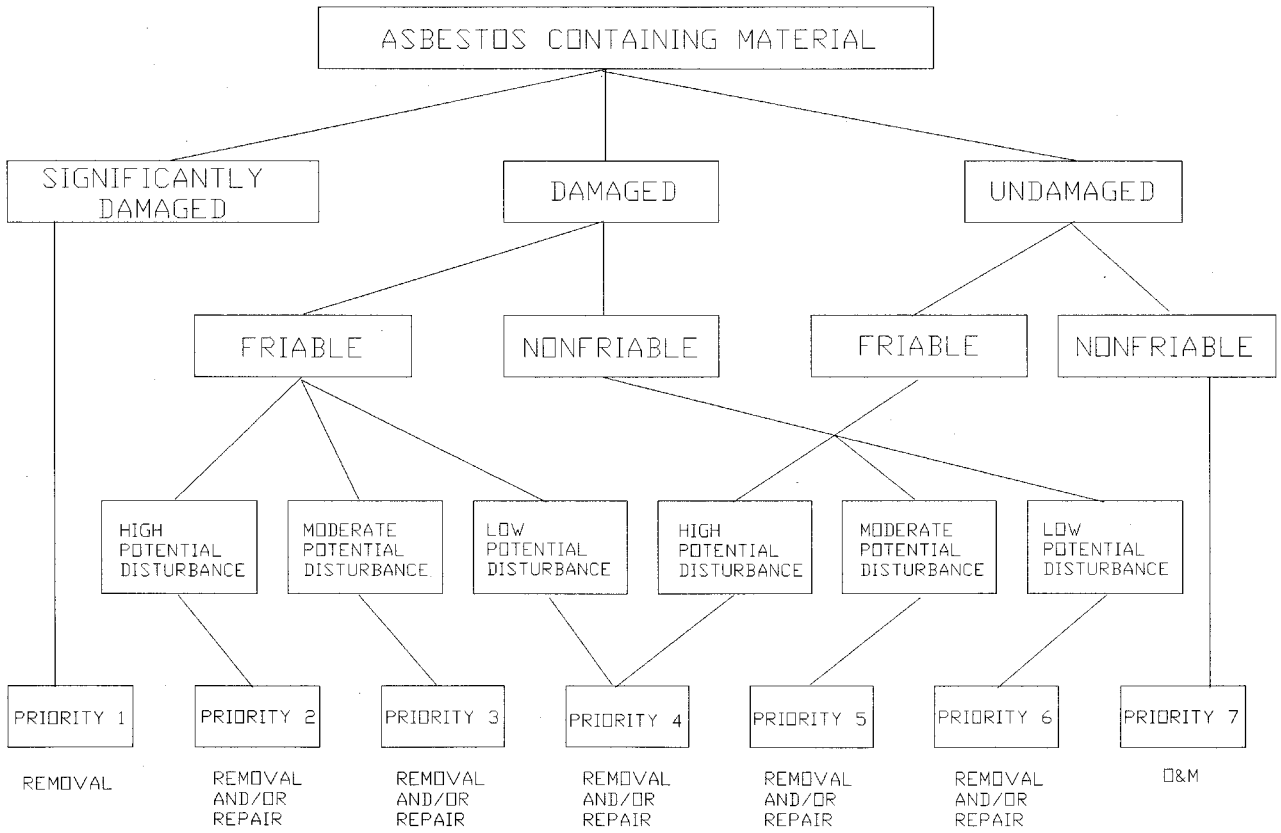
The condition assessment was performed, and an appropriate response action was identified for the ACM material at the WVDP. Then a priority was assigned to each material indicating the relative urgency of abating the asbestos hazard in that area. The higher priority materials should be addressed first. The decision tree in Figure 1 illustrates how priorities one through seven are assigned.

The highest priority (priority 1) was assigned to damaged ACM. The lowest priority (priority 7) was assigned to undamaged ACM. Refer to the decision tree in figure 1 for further clarification.

Although response actions were selected based on many of the same factors that were used to assign priorities, the two are independent. Response actions indicate how the abatement will be performed. Priorities indicate when the abatement will be performed. For example, the repair of 100 sf of priority 1 ACM would be more urgent than the removal of 2 sf of priority 2 ACM. The second area has a lower priority but a more stringent response action. If the ACM in the second space was planned for encapsulation instead of removal, its response action would have been downgraded but it would remain a priority 2 item.

FIGURE 1

PRIORITY DECISION TREE



5.2 Management Plan Summary

Table 5.2.1 lists response actions by priority. Table 5.2.2 reports the total quantity of the different materials present at WVDP by response action and also reports the grand total of known ACM. Tables 5.2.3.1 through 5.2.3.27 list the location of ACM throughout the WVDP and its respective assessment/response action.

FC1> The above mentioned tables do not include fire door insulation and do not include all roofing material present at the WVDP. These materials must be treated as ACM unless proved otherwise by bulk sampling and analysis, process knowledge, or by visual inspection when fire door insulation is fiberglass. Because of the destructive nature of bulk sampling, fire door insulation and roofing material must be handled in a case by case basis. Also, these tables may not include the total quantity of ACM floor tile. This is because floor tile may be present under existing carpeting. It is known that floor tile is present in the Annex area and in some trailers, i.e., floor tile is present in the DOE conference room and in trailer Z-23. Floor tile in the DOE conference room was sample, analyzed and is ACM. Floor tile in trailer Z-23 has not been sampled.

TABLE 5.2.1 RESPONSE ACTIONS BY PRIORITY

PRIORITY	BUILDING/AREA	MATERIAL	RESPONSE ACTION	QUANTITY
1	Main Process Plant	Pipe Insulation	Removal	701 lf
2	Waste Tank Farm	Pipe Insulation	Repair	20 lf
	Main Process Plan	Pipe Insulation	Removal	60 lf
3	Waste Tank Farm	Pipe Insulation	Repair	1 lf
	Utility Room	Pipe Insulation	Repair	94 lf
	FRS	Pipe Insulation	Removal	40 lf
	VEC Roof	Pipe Insulation	Removal	28 lf
	Utility Room Roof	Pipe Insulation	Removal	30 lf

TABLE 5.2.1 (continued) RESPONSE ACTIONS BY PRIORITY

PRIORITY	BUILDING/AREA	MATERIAL	RESPONSE ACTION	QUANTITY
4	WTF	Pipe Insulation	Repair	9 lf
	Boiler Area (Area Between 01-14 Building & UR)	Pipe Insulation	Repair	6 lf
	Condensate Tanks & Main Water Storage Tank Area	Pipe Insulation	Repair	12 lf
	Clarifier Tank & Outside Laundry Area	Pipe Insulation	Repair	21 lf
	Main Process Plant	Pipe Insulation Pipe Insulation	Repair Removal	161 lf 3 lf
	Plant Office Building	Pipe Fitting	Repair	8 lf
	UR	Turbine Insulation	Repair	8 sf
	Laundry	Pipe Insulation Pipe Insulation	Repair Removal	1 lf 1 lf
	FRS	Pipe Insulation Duct Insulation	Repair Removal	40 lf 500 sf
	TSB	Pipe Insulation	Repair	3 lf
	Main Process Plant Roofs	Pipe Insulation Duct Insulation	Removal Removal	32 lf 40 lf
	UR Roof	Pipe Insulation	Repair	2 lf
5	Control Room Roof	Duct Insulation	Repair	88 sf
6				

TABLE 5.2.1 (continued) RESPONSE ACTIONS BY PRIORITY

PRIORITY	BUILDING/AREA	MATERIAL	RESPONSE ACTION	QUANTITY
7	WTF	Pipe Insulation	O&M	164 lf
		Roof Shingles	O&M	60 sf
	Boilers Area (Area Between UR & 01-14 Building)	Pipe Insulation	O&M	486 lf
		Tank Insulation	O&M	50 sf
	Condensate Tank & Main Water Storage Tank Area	Pipe Insulation	O&M	248 lf
		Tank Insulation	O&M	4,900 sf
	Clarifier Tank & Outside Laundry Area	Pipe Insulation	O&M	45 lf
	Sprinkler Alarm Building	Pipe Wrapping	O&M	3 lf
	Interceptors Area	Pipe Insulation	O&M	72 lf
	Diesel Fuel Oil Storage Tank	Tank Insulation	O&M	100 sf

TABLE 5.2.1 (continued) RESPONSE ACTIONS BY PRIORITY

PRIORITY	BUILDING/AREA	MATERIAL	RESPONSE ACTION	QUANTITY
7	Main Process Plant	Pipe Insulation	O&M	4,998 lf
		Tank Insulation	O&M	100 lf
		Duct Insulation	O&M	274 sf
		Floor Tile	O&M	2,660 sf
		Gasket Material	O&M	unknown
	Plant Office Building	Pipe Fitting	O&M	343 lf
		Floor Tile	O&M	6,886 sf
		Cement-Asbestos Panel	O&M	862 sf
	Utility Room	Pipe Insulation	O&M	1,406 lf
		Tank Insulation	O&M	161 sf
		Turbine Insulation	O&M	8 sf
	Laundry	Pipe Insulation	O&M	29 lf
	Fire Pump House	Pipe Insulation	O&M	55 lf
	FRS	Pipe Insulation	O&M	800 lf
		Gasket Material	O&M	1 sf
	TSB	Fire Proofing Material	O&M	20 lf
		Pipe Insulation	O&M	19 lf
	BSW	Gasket Material	O&M	1 sf
		Joint Compound	O&M	1 sf
	Cold Chem Building	Tank Insulation	O&M	106 sf
	Guard House	Cement-asbestos Panel	O&M	55 sf

TABLE 5.2.1 (continued) RESPONSE ACTIONS BY PRIORITY

PRIORITY	BUILDING/AREA	MATERIAL	RESPONSE ACTION	QUANTITY
7	Annex	Floor Tile *	O&M	360 sf *
		Transite Panels	O&M	440 sf
	Trailer City	Floor Tile	O&M	80 sf
	Main Process Plant Roofs	Pipe Insulation	O&M	163 lf
		Roof & Flashing Material	O&M	11,319 sf
		Duct Insulation	O&M	112 sf
	FRS Roofs	Roof & Flashing Material	O&M	1,740 sf
	01-14 Building Roof	Roof & Flashing Material	O&M	1,375 sf

* THE TOTAL QUANTITY OF FLOOR TILE IN THE ANNEX AREA HAS NOT BEEN DETERMINED BECAUSE THIS AREA IS CARPETED. FLOOR TILE MAY BE PRESENT UNDER THE CARPET. FLOOR TILE IN DOE CONFERENCE ROOM AND TRAILER 45 WERE SAMPLED AND ANALYZED. LAB RESULT SHOW THAT THESE MATERIALS ARE ACM.. ALSO SOME TRAILERS HAVE FLOOR TILE UNDER THE CARPET (i.e., TRAILER Z-23). FLOOR TILE MUST BE TREATED AS ACM UNTIL PROVED OTHERWISE BY LAB ANALYSIS.

TABLE 5.2.2 TOTALS

	RESPONSE ACTION			
MATERIAL	O&M	REPAIR	REMOVAL	TOTAL
Pipe Insulation *	8,646 lf	378 lf	895 lf	9,919 lf
Tank Insulation	5,417 sf	0	0	5,417 sf
Turbine Insulation	8 sf	8 sf	0	16 sf
Duct Insulation	386 sf	88 sf	540 sf	1,014 sf
Transite Panels	440 sf	0	0	440 sf
Floor Tile	9,986 sf	0	0	9,986 sf **
Cement-Asbestos Panel	917 sf	0	0	917 sf
Fire-proofing Material (wrapping on two support posts)	20 lf	0	0	20 lf
Roofing & Flashing Material	14,434 sf	0	0	14,434 sf
Roof Shingles	60 sf	0	0	60 sf
Gasket Material	***	0	0	***
Joint Compound	1 sf	0	0	1 sf
TOTALS (assuming 1 lf = 1 sf)	40,315 sf	474 sf	1,435 sf	42,224 sf

* INCLUDES PIPE FITTINGS AND PIPE WRAPPING

** THE TOTAL QUANTITY OF FLOOR TILE IS UNKNOWN. THIS IS BECAUSE IN THE ANNEX AND IN SOME TRAILER, FLOOR TILE MAY BE PRESENT UNDER THE EXISTING CARPETING.

*** THE TOTAL QUANTITY OF GASKET MATERIAL IS UNKNOWN.

TABLE 5.2.3.1 WASTE TANK FARM

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Equipment Shelter	Pipe insulation	12 lf	1	Repair	3
1002	WTF outdoors area 8D-2 Instrument Room	Pipe insulation Roof Shingles	173 lf 60 sf	20 lf 0	Repair O&M	2 7

TABLE 5.2.3.2 BOILERS AREA (AREA BETWEEN UR & 01-14 BLDG)

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Boilers Area	Pipe Insulation Tank Insulation	480 lf * 50 sf	6 lf 0	Repair O&M	4 7

* INCLUDE 80 FEET RUNNING VERTICALLY ALONG THE EAST WALL OF 01-14 BUILDING

TABLE 5.2.3.3 CONDENSATE TANKS & MAIN WATER STORAGE (32D-1) TANK AREA

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Condensate Tanks and Main Water Storage Tank Area	Pipe Insulation Tank Insulation	260 lf 4,900 sf	12 lf 0	Repair O&M	4 7

TABLE 5.2.3.4 CLARIFIER TANK AND OUTSIDE LAUNDRY AREA

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Clarifier Tank Area & Outside Laundry Area	Pipe Insulation	66 lf	21 lf	Repair	4

TABLE 5.2.3.5 SPRINKLER ALARM BLDG & COOLING TOWER

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Sprinkler Alarm Building	Pipe wrapping	3 lf	0 lf	O&M	7

TABLE 5.2.3.6 INTERCEPTORS AREA

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Interceptors Area	Pipe Insulation	72 lf	0	O&M	7

TABLE 5.2.3.7 DIESEL FUEL OIL STORAGE (31D-1) TANK AREA

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Diesel Fuel Oil Storage Tank Area	Tank Insulation	100 sf *	0	O&M	7

* THE INSULATION ON THIS TANK IS NON-ACM. HOWEVER, THE EAST & WEST ENDS OF THIS TANK ARE COVERED WITH TAR-LIKE MATERIAL AND THIS TAR-LIKE MATERIAL IS ACM. BECAUSE OF THIS, THE INSULATION COVERED WITH THIS TAR-LIKE MATERIAL IS CONSIDERED ACM.

TABLE 5.2.3.8 LOW LEVEL WASTE TREATMENT FACILITY (02-PLANT)

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY

ALL VISIBLE SUSPECT ACM HAS BEEN REMOVED FROM THIS FACILITY.

TABLE 5.2.3.9 LAGOONS 2 & 3

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Area Between Lagoons 2 & 3	See NOTE				

NOTE ACM WAS REMOVED IN SUMMER 1999.

TABLE 5.2.3.10 MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
B002	GOA	Pipe Insulation	190 lf	3 lf	Repair	4
B003	Sample Cell	SEE NOTE 1				
1002	MOA, Entrance	Pipe Insulation	77 lf	0 lf	O&M	7
1003	MOA, West	Pipe Insulation	125 lf	0 lf	O&M	7
1004 & 1005	MOA, East	Pipe Insulation	120 lf	2 lf	Repair	4
1008	CAA (Cell Access Aisle)	Pipe Insulation	30 lf	2 lf	Repair	4
1010	RAM Equipment Room	SEE NOTE 1				
1011	SEE 1st. FLOOR PLAN	SEE NOTE 1				
1012	SEE 1st. FLOOR PLAN	Pipe Insulation	30 lf	0	O&M	7

NOTE 1: NO ACCESS TO THIS SPACE

NOTE: FIRE DOOR INSULATION HAS NOT BEEN QUANTIFIED BECAUSE THE DESTRUCTIVE NATURE OF THE SAMPLING. THUS, ALL FIRE DOOR INSULATION MUST BE TREATED AS ACM UNLESS PROVED OTHERWISE BY LAB ANALYSIS OR BY VISUAL INSPECTION WHEN THE INSULATION IS FIBERGLASS

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1015	South WRPA	Pipe Insulation	25 lf	0	O&M	7
1016	LWA (Lower Warm Aisle)	Pipe Insulation Tank Insulation	27 lf 100 sf	3 lf 0	Repair O&M	4 7
1017	PPH (Product Packaging Area)	Pipe Insulation	55 lf	2 lf	Repair	4
1018	ULO (Uranium Loadout Cell)	Pipe Insulation	25 lf	3 lf	Repair	4
1019	Off-Gas Blower Cell	SEE NOTE 1				
1020	Acid Recovery Pumps Cell	SEE NOTE 1				
1021	MSM Repair Shop	Pipe Insulation	125 lf	4 lf	Repair	4
1023	Off-Gas Cell	SEE NOTE 1				
1024	Scrap Removal	SEE NOTE 1				
1025	EDR (Equipment Decon Room)	SEE NOTE 2	0			

NOTE 1: NO ACCESS TO THIS SPACE
NOTE 2: NO VISIBLE SUSPECT ACM (INSPECTION PERFORMED FROM WINDOW)

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1026	South Stairs, 1st Floor	SEE NOTE 1				
1027	Southwest Stairs, 1st. Floor	Pipe Insulation	85 lf	0	O&M	7
2001	East Stairs, 2nd. Floor	Pipe Insulation	25 lf	0	O&M	7
2002	SEE NOTE 2	Pipe Insulation	70 lf	0	O&M	7
2003, 2004, & 2007	LWA and North-South Hallway at East end of LXA	Pipe Insulation	830 lf	60 lf 10 lf	Removal Repair	2 4
2005	UWA (Upper Warm Aisle)	Pipe Insulation	220 lf	16 lf 1 lf	Repair Removal	4 1
2006	Area between Ventilation Wash Room and East Stairs	Pipe Insulation	100 lf	14 lf	Repair	4
2007	SEE SPACE 2003 ABOVE					
2008	VSR (Ventilation Supply Room)	Pipe Insulation Floor Tile	75 lf 160 sf	2 lf 0	Repair O&M	4 7

NOTE 1: NO ACCESS TO THIS SPACE
NOTE 2: SPACE (N-S CORRIDOR) AT WEST SIDE OF EAST STAIRS, 2nd. FLOOR

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2009	"Old" Instrument Room	SEE NOTE 1				
2011	COA (Chemical Operating Aisle)	Pipe Insulation	1,170 lf	24 lf 19 lf	Removal Repair	1 4
2012	North Stairs, 2nd. Floor	Pipe Insulation	9 lf	0	O&M	7
2013 & 2014	EDRVA (Equipment Decon Room Viewing Aisle)	Pipe Insulation	86 lf	4 lf	Repair	4
2015	CVA (Chemical Viewing Aisle)	Pipe Insulation	60 lf	0	O&M	7
2016	Southwest Stairs, 1.5 & 2nd. floors	Pipe Insulation	180 lf	0	O&M	7
2017	South Stairs, 2nd. Floor	SEE NOTE 2				
3002	NOA (North Operating Aisle)	Pipe Insulation Duct Insulation	60 lf 170 sf	1 sf 0	Repair O&M	4 7
3004	Analytical Lab	Pipe Insulation	33 lf	4 lf	Repair	4
3005	Counting Room	Pipe Insulation Floor Tile	12 lf 270 sf	0 0	O&M O&M	7 7

NOTE 1: NO VISIBLE SUSPECT ACM
NOTE 2: NO ACCESS TO THIS SPACE

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3006, 3008, 3011 & 3012	Hallways (North-South; West and East), 3rd. Floor	Pipe Insulation Duct Insulation Floor Tile (SEE NOTE 1)	66 lf 104 lf 750 sf	0 0 0	O&M O&M O&M	7 7 7
3007	Mass Spec Lab	Pipe Insulation Floor Tile	32 lf 500 sf	0 0	O&M O&M	7 7
3008	SEE SPACE 3006, ABOVE					
3009	New Vitrification Lab	Pipe Insulation	70 lf	5 lf	Repair	4
3010	Analytical Cell	SEE NOTE 2				
3011	SEE SPACE 3006, ABOVE					
3012	SEE SPACE 3006, ABOVE					
3013	Radiochemistry Lab	Pipe Insulation	60 lf	0	O&M	7
3014	Storage Room	Floor Tile	144 sf	0	O&M	7
3015	Records Preparation	Pipe Insulation	90 lf	0	O&M	7

NOTE 1: PART OF THE FLOOR TILE IN THIS SPACE HAS BEEN COVERED FOR SHIELDING
NOTE 2: NO ACCESS TO THIS SPACE

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3015-A	Pipe Way	Pipe Insulation	80 lf	15 lf	Repair	4
3018	Women's Room, 3rd. Floor	Pipe Insulation	12 lf	1 lf	Repair	4
3020	OGA (Off-Gas Aisle)	Pipe Insulation	500 lf	500 lf	Removal	1
3025	Southwest Stairs, 2.5, 3 & 3.5 Floor	Pipe Insulation	115 lf	0	O&M	7
3026	Acid Recovery Cell	SEE NOTE 1				
3027	CRC (Chemical Crane Room)	SEE NOTE 1				
3028	Air Lock to CRC	SEE NOTE 1				
3029	Hoist Enclosure	SEE NOTE 1				
4001	South Stair, 4th. Floor	Pipe Insulation	3 lf	3 lf	Removal	4

NOTE 1: NO ACCESS TO THIS SPACE

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
4002	UXA (Upper Extraction aisle)	Pipe Insulation	765 lf	50 lf	Repair	4
4003	Control Room	Pipe Insulation Floor Tile	32 lf 740 sf	0 0	O&M O&M	7 7
4004	North Side of Control Room	Pipe Insulation Duct Insulation	8 lf 30 sf	0 0	O&M O&M	7 7
4005	Boiler Room in Control Room	Pipe Insulation	4 lf	0	O&M	7
4006	Office in Control Room	Pipe Insulation Floor Tile	16 lf 96 sf	0 0	O&M O&M	7 7
4007 & 4008	PCR (Process Chemical Room)	Pipe Insulation	35 lf	1 lf	Repair	4
4009	Hot Acid Cell	SEE NOTE 1				
4010	Pipeway	Pipe Insulation	SEE NOTE 2			

NOTE 1: NO ACCESS TO THIS SPACE
NOTE 2: ACM INCLUDED IN SPACE 4002

TABLE 5.2.3.10 (continued) MAIN PROCESS PLANT

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
4012	VEC (Ventilation Exhaust Cell)	Pipe Insulation Gasket Material	SEE NOTE 1			
5001	XCR (Extraction Chemical Room)	Pipe Insulation	176 lf	176 lf	Removal	1
5003	Pipeway	Pipe Insulation	SEE NOTE 2			

| NOTE 1: NO ACCESS TO THIS ROOM. HOWEVER, APPROXIMATELY 15 lf OF PIPE INSULATION IS VISIBLE FROM THE DOOR'S
| WINDOW. ALSO GASKET MATERIAL MAY EXIST IN THIS SPACE.

NOTE 2: QUANTITY OF ACM IS INCLUDED IN SPACE 5001

TABLE 5.2.3.11 PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
ALL	SEE NOTE 1					
1001	Airlock (Foyer) & Canopy	Cement -Asbestos Panel	5 panels *	0	O&M	7
1002	Lobby	Floor Tile Fitting Insulation	120 sf 4 lf **	0 0	O&M O&M	7 7
1003	Stairwell, 1st. Floor	Floor Tile	140 sf	0	O&M	7
1004	Stairwell, 1½ Floor	Floor Tile	38 sf	0	O&M	7
1005	Main Plant Ops Lunch Room	Floor Tile Fitting Insulation	190 sf 18 lf	0 0	O&M O&M	7 7

NOTE 1: INSULATED PIPING RUN ABOVE THE SUSPENDED CEILING THROUGHOUT THE PLANT OFFICE BUILDING. THE STRAIGHT PIPE INSULATION IS FIBERGLASS (DETERMINED BY VISUAL INSPECTION AND BY TOUCHING WHEN ACCESSIBLE AND ALLOWED). HOWEVER, ALL FITTING INSULATION IS CONSIDERED ASBESTOS CONTAINING MATERIAL (ACM). THIS IS BECAUSE DURING THE 1989 INSPECTION 2 SAMPLES OF FITTING MATERIAL WERE TAKEN AND DURING THE 1995 REINSPECTION 10 SAMPLES WERE TAKEN. LAB RESULTS SHOW THAT 50% OF THOSE SAMPLES ARE ACM. (IT WAS REPORTED THAT SOME ELBOWS ARE INSULATED WITH FIBERGLASS).

* 3 - 4.5' x 3' and 2 - 4.5' x 2'
** Each fitting is considered one linear foot

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1006	Men's Locker Room	Pipe Fitting	12 lf	0	O&M	7
1007	Boiler Room in Men's Locker Room	Pipe Fitting	11 lf	0	O&M	7
1008	Men's Room	Pipe Fitting	44 lf	0	O&M	7
1009	drying Area in Mens' locker Rm.	Pipe Fitting	2 lf	0	O&M	7
1011	R&S Office	Floor Tile	390 sf	0	O&M	7
1012	Office (D. Tarnish)	Floor Tile	70 sf	0	O&M	7
1013	Office (R. Lauber)	Floor Tile	70 sf	0	O&M	7
1014	Shift Supervisors' Office	Floor Tile Cement-Asbestos Panel Fitting Insulation	375 sf 9 panels * 62 lf	0 0 6 lf	O&M O&M Repair	7 7 4
1015	Smoke Room	Floor Tile Pipe fitting	110 sf 5 lf	0 0	O&M O&M	7 7
1016	Janitor's Closet	Floor Tile	80 sf	0	O&M	7

* Panels are 4.5' x 3.5' each

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1019	Ladies' Locker Room	Fitting Insulation	4 lf *	1 lf *	O&M	7
2001	Stairwell, 2nd. Floor	Floor Tile	50 sf	0	O&M	7
2002	Hallway (E-W, by Stairwell)	Floor Tile	50 sf	0	O&M	7
2003	Hallway (N-S, Between Offices)	Floor Tile Fitting Insulation	470 sf 60 lf	0 0	O&M O&M	7 7
2004	Office (J. Jablonski)	Floor Tile Fitting Insulation Cement-Asbestos Panel	110 sf 10 lf 4 panels **	0 0 0	O&M O&M O&M	7 7 7
2005	Office	Floor Tile Fitting Insulation Cement-Asbestos Panel	166 sf 18 lf 4 panels **	0 0 0	O&M O&M O&M	7 7 7

* DAMAGE ELBOW INSULATION IS FIBERGLASS

** Panels are 4.5' x 3.5' each

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2006	Office (S. MacVean)	Floor Tile Fitting Insulation Cement-Asbestos Panel	140 sf 7 lf 4 panels *	0 0 0	O&M O&M O&M	7 7 7
2007	Ladies' Room	Floor Tile	25 sf	0	O&M	7
2008	Men's Room	Floor Tile Pipe Fitting	20 sf 9 lf	0 0	O&M O&M	7 7
2009	Stairwell to Main Plant	Floor Tile Fitting Insulation	120 sf 4 lf	0 1 lf **	O&M O&M	7 7
2010	Office Area (S. of Men's Room)	Floor Tile Fitting Insulation	890 sf 7 lf	0 0	O&M O&M	7 7
2011	South Hallway (to Main Plant)	Floor Tile	42 sf	0	O&M	7

* Panels are 4.5' x 3.5' each

** Damaged elbow insulation is fiberglass

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2012	Office	Floor Tile	110 sf	0	O&M	7
		Fitting	12 lf	0	O&M	7
		Insulation				
		Cement-Asbestos Panel	3 panels *	0	O&M	7
		Fire Door	SEE NOTE			
2013	Office	Floor Tile	110 sf	0	O&M	7
		Fitting	10 lf	0	O&M	7
		Insulation				
		Cement-Asbestos Panel	3 panels *	0	O&M	7
2014	Office	Floor Tile	130 sf	0	O&M	7
		Fitting	8 lf	1 lf	Repair	4
		Insulation				
		Cement-Asbestos Panel	2 panels *	0	O&M	7
3001	Stairwell, 3er. floor	Floor Tile	50 sf	0	O&M	7
3002	Hallway (E-W by Stairwell)	Floor Tile	80 sf	0	O&M	7

* Panels are 4.5' x 3.5'

NOTE: FIRE DOOR INSULATION HAS NOT BEEN QUANTIFIED BECAUSE THE DESTRUCTIVE NATURE OF THE SAMPLING. THUS, ALL FIRE DOOR INSULATION MUST BE TREATED AS ACM UNLESS PROVED OTHERWISE BY LAB ANALYSIS OR BY VISUAL INSPECTION WHEN THE INSULATION IS FIBERGLASS

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3003	Office	Floor Tile Cement-Asbestos Panel	90 sf 3 panels *	0 0	O&M O&M	7 7
3004	Hallway (N-S, Between Offices)	Floor Tile Fitting Insulation	460 sf 4 lf	0 0	O&M O&M	7 7
3005	Office	Floor Tile	70 sf	0	O&M	7
3006	Office	Floor Tile Cement-Asbestos Panel	176 sf 3 panels *	0 0	O&M O&M	7 7
3007	Office	Floor Tile Cement-Asbestos Panel	352 sf 6 panels *	0 0	O&M O&M	7 7
3008	Mechanical Room	Fitting Insulation	40 lf	0	O&M	7
3009	Office	Floor Tile	170 sf	0	O&M	7
3010	Men's Room	Floor Tile	21 sf	0	O&M	7

* Panels are 4.5' x 3.5'

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3011	Janitor's Closet	Floor Tile	40 sf	0	O&M	7
3012	Ladies' Room	Floor Tile	21 sf	0	O&M	7
3013	Storage	Floor Tile	70 sf	0	O&M	7
3014	Office Area	Floor Tile	420 sf	0	O&M	7
3015	Hallway (to Main Plant)	Floor Tile	35 sf	0	O&M	7
3016	Conference Room	Floor Tile Pipe Fitting	145 sf 1 lf	0 1 lf	O&M Repair	7 4
3017	Office	Floor Tile Cement-Asbestos Panels	175 sf 3 panels *	0 0	O&M O&M	7 7
3018	Office	Floor Tile Cement-Asbestos Panels	175 sf 3 panels *	0 0	O&M O&M	7 7

* Panels are 4.5' x 3.5'

TABLE 5.2.3.11 (continued) PLANT OFFICE BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3019	Office	Floor Tile Cement-Asbestos Panels	160 sf 2 panels *	0 0	O&M O&M	7 7
3020	Office	Floor Tile	160 sf	0	O&M	7

* Panels are 4.5' x 3.5'

TABLE 5.2.3.12 UTILITY ROOM

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Utility Room	Pipe Insulation Tank Insulation Turbine Insulation	1,500 lf 161 sf 16 sf	94 lf 0 8 sf	Repair O&M Repair	3 7 4

TABLE 5.2.3.13 LAUNDRY

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Cold Side (North Side)	Pipe Insulation	30 lf	1 lf	Repair	4
1002	Hot Side (South Side)	Pipe Insulation	1 lf	1 lf	Removal	4

TABLE 5.2.3.14 FIRE PUMP HOUSE

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Fire Pump House	Pipe Insulation	55 lf	0	O&M	7

TABLE 5.2.3.15 FUEL RECEIVING & STORAGE (FRS)

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Pool Area	Pipe Insulation	880 lf	40 lf 40 lf	Repair Removal	4 3
1003	FRS Decon Pump House	Exhaust System Gasket	1 sf *	0	O&M	7
1007	FRS Outdoors	Duct Insulation **	500 sf	500 sf	Removal	4

* TWO GASKETS, ~12 " DIAMETER EACH

** DUCT INSULATION IS FIBERGLASS, HOWEVER, THIS MATERIAL IS COVERED WITH BLACK TAR-LIKE MATERIAL. THIS BLACK TAR-LIKE MATERIAL IS ACM. THIS ACM IS NON-FRIABLE.

TABLE 5.2.3.16 TEST & STORAGE BUILDING (TSB)

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1008	Vit Cold Lab	Pipe Insulation **	2 lf	0	O&M	7
1009	Tool Crib (East Side)	Fire Proofing Material *	20 lf	0	O&M	7
1010	Restroom	Pipe Insulation **	20 lf	3 lf	Repair	4

* THIS FIRE PROOFING MATERIAL IS LOCATED ON TWO ~10' LONG SUPPORT POSTS. THIS MATERIAL IS PAPER-LIKE MATERIAL WRAPPED ON THE TWO POSTS.

** THIS MATERIAL IS ON TOP OF THE SPACE'S ROOF.

TABLE 5.2.3.17 BULK STORAGE WAREHOUSE (BSW)

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Boiler Room	Gasket Material	1 sf	0	O&M	7
1002	Generator Room	Joint Compound *	1 lf	0	O&M	7

* THIS MATERIAL IS A JOINT COMPOUND CEMENT-LIKE MATERIAL. IT IS NOT FRIABLE

TABLE 5.2.3.18 COLD CHEM BUILDING

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1002	Cold Chem Pump Room	Tank Insulation *	106 sf	0	O&M	7

* TANK INSULATION IS FIBERGLASS. HOWEVER, THIS FIBERGLASS IS COVERED WITH BLACK TAR-LIKE MATERIAL AND THIS TAR-LIKE MATERIAL IS ACM. ONLY THE BOTTOM CONE SECTION OF THIS TANK IS CONSIDERED ACM. THIS MATERIAL IS LOCATED ON TANK 65D-1.

TABLE 5.2.3.19 GUARD HOUSE

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1001	Portal Monitor Area	Cement-Asbestos Panel *	55 sf	0	O&M	7

| * THIS PANELS ARE LOCATED ABOVE THE WINDOWS ON THE NORTH AND WEST WALLS.

TABLE 5.2.3.20 ANNEX

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
ALL	SEE NOTE 1					
1011	Boiler Room	Transite Panels	440 sf	0	O&M	7
1032	DOE Conference Room	Floor Tile *	360 sf	0	O&M	7

NOTE 1: FLOOR TILE MAY BE PRESENT IN SOME TRAILERS UNDER EXISTING CARPETING AND MAY BE SANDWICHED BETWEEN PARTITION WALLS AND TRAILERS' FLOOR. THE TOTAL QUANTITY OF FLOOR TILE IN THE ANNEX AREA IS UNKNOWN.

* THIS MATERIAL IS LOCATED UNDER THE CARPET.

NOTE 2: Trailer Z-23 contains suspect ACM floor tile.

TABLE 5.2.3.21 TRAILER CITY

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
1003	Mary Hays' Office	Floor Tile	80 sf	0	O&M	7

TABLE 5.2.3.22 MAIN PROCESS PLANT ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2019	WRPA Roof	Flashing Material *	250 sf	0	O&M	7
2020	HEV Roof	Roof & Flashing Material **	264 sf	0	O&M	7
2021	MSM Roof (ele 116'-8")	Roof & Flashing Material **	1450 sf	0	O&M	7
2023	MSM Roof (Low bay)	SEE NOTE 1				
3030	PMCR Roof	SEE NOTE 1				
3032	PPH Roof	Roof & Flashing Material **	375 sf	0	O&M	7

* FLAT ROOF MATERIAL WAS BULK SAMPLED AND ANALYZED: IT IS NON -ACM. FLASHING IS ASSUMED ACM

** ORIGINAL (NFS ERA) BUILT-UP ROOFING AND FLASHING MATERIALS HAVE BEEN SAMPLED. i.e. UTILITY ROOM HIGH AND LOW BAYS, PLANT OFFICE BUILDING AND 01-14 BUILDING). LAB RESULTS SHOW THAT THESE MATERIALS ARE ACM. THUS, THIS ROOFING MATERIAL IS CONSIDERED ACM.

NOTE1 ACM ROOF MATERIAL REPLACED WITH NON-ACM ROOF MATERIAL.

TABLE 5.2.3.22 (continued) MAIN PROCESS PLANT ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
3033	EDR Roof	Roof & Flashing Material *	~500 sf	0	O&M	7
3034	CVA Hatch Roof	Roof & Flashing Material *	~ 60 sf	0	O&M	7
3035	SST Pump Room Roof	Roof & Flashing Material *	410 sf	0	O&M	7
4012	A&PC Lab Roof	Pipe Insulation Flashing Material	30 lf 315 sf	30 lf 0	Removal O&M	4 7
4013	OGA Roof	Pipe Insulation Roof & Flashing Material *	22 lf 1,450 sf	7 sf 0	Removal O&M	5 7
4014	7D-5 Roof	Roof & Flashing Material *	430 sf	0	O&M	7

* ORIGINAL (NFS ERA) BUILT-UP ROOFING AND FLASHING MATERIALS HAVE BEEN SAMPLED. i.e. UTILITY ROOM HIGH AND LOW BAYS, PLANT OFFICE BUILDING AND 01-14 BUILDING). LAB RESULTS SHOW THAT THESE MATERIALS ARE ACM. THUS, THIS ROOFING MATERIAL IS CONSIDERED ACM.

TABLE 5.2.3.22 (continued) MAIN PLANT PROCESS ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
4016	CPC Roof	SEE NOTE 1				
4017	CPCCR Roof	SEE NOTE 1				
4018	PMC Door Enclosure Roof	Roof & Flashing Material *	250 sf	0	O&M	7
4019	Southwest Stairs Roof	Pipe Insulation SEE NOTE 1	85 lf **	0	O&M	7

* ORIGINAL (NFS ERA) BUILT-UP ROOFING AND FLASHING MATERIALS HAVE BEEN SAMPLED. i.e. UTILITY ROOM HIGH AND LOW BAYS, PLANT OFFICE BUILDING AND 01-14 BUILDING). LAB RESULTS SHOW THAT THESE MATERIALS ARE ACM. THUS, THIS ROOFING MATERIAL IS CONSIDERED ACM.

** THIS QUANTITY INCLUDES PIPING RUNNING VERTICALLY ALONG THE SOUTH WALL OF THIS STAIRS

NOTE 1 ACM ROOF MATERIAL REPLACED WITH NON-ACM ROOF MATERIAL.

TABLE 5.2.3.22 (continued) MAIN PLANT PROCESS ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
5002	Control Room Roof	Roof & Flashing Material * Duct Insulation **	2,640 sf ~240 sf	0 40 sf 88 sf	O&M Removal Repair	7 4 5
5006	VEC Roof	Pipe Insulation Roof & Flashing Material *	93 lf *** 2,925 SF	28 lf 0	Removal O&M	3 7

* ORIGINAL (NUCLEAR FUEL SERVICES ERA) BUILT-UP ROOFING AND FLASHING MATERIALS HAVE BEEN SAMPLED. i.e. UTILITY ROOM HIGH AND LOW BAYS, PLANT OFFICE BUILDING AND 01-14 BUILDING). LAB RESULTS SHOW THAT THESE MATERIALS ARE ACM. THUS, THIS ROOFING MATERIAL IS CONSIDERED ACM.

** DUCT WORK INSULATION IS COVERED WITH BLACK TAR-LIKE MATERIAL. THIS BLACK TAR-LIKE MATERIAL HAS BEEN SAMPLED IN OTHERS AREAS. (i.e. TANK 65D-1 IN COLD CHEM BLDG; DIESEL FUEL STORAGE TANK; DUCT INSULATION IS FRS). LAB RESULTS SHOW THAT THIS TYPE OF MATERIAL IS ACM.. THUS, THIS MATERIAL IS CONSIDERED ACM.

*** INCLUDED IN THIS QUANTITY ARE 30 LF OF 14 " DIAM PIPE THAT ARE CONSIDERED ACM, UNLESS PROVED OTHERWISE BY BULK SAMPLING, BECAUSE ELBOW INSULATION ON THIS LINE IS ACM.

TABLE 5.2.3.22 (continued) MAIN PLANT PROCESS ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
5009	XCR Roof	SEE NOTE 1				

NOTE 1 ACM ROOF MATERIAL WAS REPLACED WITH NON-ACM ROOF MATERIAL.

TABLE 5.2.3.23 PLANT OFFICE BUILDING ROOF

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
4001	Plant Office Building Roof	SEE NOTE 1				

NOTE 1 THIS ACM ROOF WAS REPLACED WITH NON-ACM MATERIAL IN 1999.

TABLE 5.2.3.24 FRS ROOFS

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2001	FRS High Bay (ele 149')	Flashing Material *	320 sf	0	O&M	7
2002	FRS Low Bay (ele 113')	Flashing Material *	220 sf	0	O&M	7
2003	FRS Ventilation Building	Roof & Flashing Material **	1,200 sf	0	O&M	7

* THIS ROOFING MATERIAL WAS REPLACED AT THE SAME TIME THE A&PC LAB ROOF WAS REPLACED. A&PC LAB ROOF WAS ANALYZED FOR ASBESTOS. LAB RESULTS SHOW THAT ONLY THE FLASHING MATERIAL IS ACM. THUS, FLASHING MATERIAL IS CONSIDERED ACM AND FLAT ROOF IS CONSIDERED NON-ACM.

** ORIGINAL (NFS ERA) BUILT-UP ROOFING AND FLASHING MATERIALS HAVE BEEN SAMPLED. i.e. UTILITY ROOM HIGH AND LOW BAYS, PLANT OFFICE BUILDING AND 01-14 BUILDING). LAB RESULTS SHOW THAT THESE MATERIALS ARE ACM. THUS, THIS ROOFING MATERIAL IS CONSIDERED ACM.

TABLE 5.2.3.25 LAUNDRY ROOF

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2001	Laundry Roof	SEE NOTE				

NOTE THIS ACM ROOF WAS REPLACED WITH NON-ACM MATERIAL.

TABLE 5.2.3.26 01-14 BUILDING ROOF

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
4001	01-14 Building Roof	Roof & Flashing Material	1,375 sf	0	O&M	7

TABLE 5.2.3.27 UTILITY ROOM ROOF

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2001	UR Roof, Low Bay	SEE NOTE 1				
2002	UR Roof, High Bay	SEE NOTE 1				

NOTE1 ALL ACM IN THESE TWO SPACES WERE REPLACED.

TABLE 5.2.3.28 UTILITY ROOM ROOF

MATERIAL LOCATION/ASSESSMENT AND RESPONSE ACTIONS

SPACE #	SPACE NAME	TYPE OF MATERIAL	TOTAL QUANTITY	DAMAGED QUANTITY	RESPONSE ACTION	PRIORITY
2001	LLWTF Roof	Roof & Flashing Material *	1,366 sf	0**	O&M	7

* THE ORIGINAL BUILT UP ROOF MATERIAL WAS COVERED WITH EPDM ROOFING MATERIAL IN 1989. REFER TO DRAWING A4-100-011.

** THE ACTUAL CONDITION OF THE MATERIAL IS UNKNOWN BECAUSE IT WAS COVERED WITH EPDM.

6.0 PROCEDURE

6.1 Purpose of O&M Program

The principal objective of this O&M program is to prevent exposure of all building occupants to asbestos fibers. To accomplish this objective, this program include work practices to 1) maintain ACM in good condition, 2) ensure proper cleanup and repair activities when needed, 3) prevent further release of asbestos fibers, and 4) monitor the condition of all ACM .

6.2 O&M Program Elements

There are seven major components to the O&M program:

1. Notification: Tell building occupants where ACM is located, and how and why to avoid disturbing ACM. All persons affected should be informed.

2. Training: Employee training and education, as required.

3. Controls: Control activities, by IWP, RWP, SOP's or work procedures which might disturb ACM.

4. Work Practices: Good work practices to avoid or minimize fiber release during activities affecting ACM.

5. Worker Protection: Medical surveillance and respiratory protection, as applicable.

6. Surveillance: Regular surveillance to note, assess, and document any changes in the ACM's condition.

7. Recordkeeping: Document activities involving ACM and maintain records.

6.2.1 Notifications

A. To Employees/Building Occupants.

West Valley Nuclear Services has an ongoing notification and warning program for persons who may come into contact with asbestos containing materials. The notification and warning program serves two purposes (1) it alerts affected parties to a potential hazard in the building, and (2) it generates a broad involvement in the O&M program. Building occupants who are aware of the ACM are less likely to disturb the material and cause fiber release.

Warning labels (DANGER - CONTAIN ASBESTOS FIBERS - AVOID CREATING DUST - CANCER AND LUNG DISEASE HAZARD - AVOID BREATHING AIRBORNE ASBESTOS FIBERS) are placed on friable ACM, where feasible, to alert and remind building occupants not to disturb ACM. Caution signs are posted on the entrance door to areas/rooms where ACM is present.

The caution sign reads: "CAUTION: ITEMS IN THIS AREA CONTAIN ASBESTOS - DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT - AVOID CREATING DUST FROM THESE ITEMS -CANCER AND LUNG DISEASE HAZARD - AVOID BREATHING AIRBORNE ASBESTOS FIBERS."

Different informational sessions are provided by WVNS to inform all WVDP employees of the presence of asbestos containing materials in the work place. All employees are included in this informational sessions in one way or another. These informational sessions include: 1) General Employee Training (GET) briefing, given to all WVNS employees and subcontractors during the first week of employment at WVDP; 2) Annual Mandatory Briefing; and 3) Enhanced Asbestos Awareness Briefing. The first two training programs are designed for all employees including new employees, managers, secretarial and administrative personnel. The Enhanced Asbestos Awareness Briefing is designed for persons performing job activities, like repairs, housekeeping, or routinely work in locations where asbestos containing material is present, without disturbing (intentionally) any ACM.

Topics covered during the West Valley Nuclear Services enhanced asbestos awareness and information sessions are:

1. Regulatory Background - Environmental Compliance

   a. Occupational Safety and Health Administration

      - General Industry Standards
      - Construction Standards

   b. National Emissions Standards For Hazardous Air Pollutants

      - Air Emissions
      - Disposal
      - Notification Requirements

   c. Asbestos Hazard Emergency Response Act

d. New York State Department of Labor Industrial Code Rule 56

- Abatement Regulations

2. Type and Location of Asbestos at the WVDP

3. Potential Health Effects Associated with Asbestos

a. lung cancer

b. mesothelioma

c. asbestosis

d. synergistic effects of cigarette smoking

4. What is Being Done at the WVDP to Address Asbestos Problem

a. Initial inspection to determine problem areas

b. Getting workers certified per NYS requirements as asbestos handlers in order to perform removals and repairs of ACM

c. Informing employees who have the potential to come in contact with ACM of hazards associated with it

d. Posting entrances in maintenance areas of facility with "CAUTION: ITEMS IN THIS AREA CONTAIN ASBESTOS - DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT AVOID CREATING DUST FROM THESE ITEMS - CANCER AND LUNG DISEASE HAZARD - AVOID BREATHING AIRBORNE ASBESTOS FIBERS"

e. Labeling ACM with "DANGER - CONTAINS ASBESTOS FIBERS - AVOID CREATING DUST - CANCER AND LUNG DISEASE HAZARD -AVOID BREATHING AIRBORNE ASBESTOS FIBERS".

f. Abatement of materials in considerable disrepair

- removal and replacement
- encapsulation

g. Performing inspections every three years to check condition of ACM which remains by an accredited NYS/EPA Asbestos Inspector

h. IWP system used to screen maintenance in areas near ACM to ensure proper precautions

i. Periodic air sampling performed to make sure airborne levels are below the PEL level (0.1 fibers/cc)

j. Personal air sampling performed by IH&S during asbestos removal to document that PELs have not been exceeded

k. Employee medical surveillance per WVDP-026

5. Instructions to avoid disturbing ACM and reporting of any unplanned asbestos disturbances

B. Notification to Regulatory Agencies

(See attachments C&D for examples of forms to be used)

Planned Demolition, Renovation and/or Removal
Nonemergency demolition, renovation and/or removal projects involving at least 260 linear feet or 160 square feet of friable asbestos material require a minimum of 10 days written notification to the appropriate regulatory agencies prior to commencing work. Therefore, Environmental Affairs requires a minimum of 30 days written notice to make the appropriate notification of other agencies.

Emergency Demolition, Renovation and/or Removal

Emergency demolition, renovation, and/or removal must be orally reported directly to Environmental Affairs prior to commencing work, if practical or immediately thereafter. Environmental Affairs will notify the appropriate regulatory agency, if required.

Change of Starting Date or Cancellation

If the start of the asbestos removal project will be delayed or canceled, immediate oral notification shall be made to Environmental Affairs who will orally notify the appropriate regulatory agency. The new starting date and any change in the originally scheduled completion date will be provided. No written confirmation is required. The starting date of an asbestos removal is important since it is the most likely date of regulatory inspection; therefore, the starting date on the notification should be as accurate as possible.

Record of Oral Regulatory Communication

All oral regulatory communications will be documented and copies provided to the appropriate parties. See Attachment E for an example of the form to be used.

6.2.2 Employee Training and Education

Appropriate maintenance and custodial staff who work in a building which contains ACM are required to receive the enhanced asbestos awareness training seminar.

Workers who may conduct asbestos abatement in accordance with the applicable WVNS SOPs or whose work involves direct (intentional) contact with ACM require a New York State/EPA asbestos handler's certificate. To receive the certificate, workers must pass a 32-hour training program and an 8-hour annual recertification course.

The required 32-hour training program shall include information contained in the awareness seminar. The following shall also be included:

- Methods and procedures for handling and disposing ACM
- Personal protection, including respiratory protection and protective clothing
- Working knowledge of the O&M program including safety, access, and reinspection
- Equipment availability and uses including wet cleaning, HEPA vacuuming, etc.
- Hands-on training in the use of respirators, personal protection, work practices, and fiber control
- The importance of record keeping and employee record generation requirements
- Requirements for work order clearance through the asbestos program manager of all renovation and ACM disturbance activities
- Training and licensing requirements for the state and local agencies, if applicable

The training for staff who will contact ACM (32-hour training) must be taught by a state-certified training center. Where custodial and maintenance services are performed under contract with a service company, the requirement that the service company's staff has been properly trained for working with ACM shall be specified in the WVDP contract documents. Training will include successful completion of courses on asbestos control and special O&M programs which meet the requirements discussed above. The company's respirator and medical surveillance programs should be reviewed. In addition, the performance of the company should be checked with other customers, particularly with owners of buildings containing ACM. If the service company meets the training and performance requirements, an initial session should be held with the company's supervisors and workers to inform them of the location of ACM in the building and of all building-specific asbestos operating procedures. The asbestos program manager assumes responsibility for insuring that the service company adheres to all aspects of the O&M program.

Persons who perform inspections and reinspections must complete a three-day training course given by a State or EPA accredited training provider. The inspector training course shall adequately address the following topics:

a. Background information on asbestos

b. Potential health effects related to asbestos exposure

c. Functions/qualifications and role of inspectors

d. Legal liabilities and defenses

e. Understanding building systems

f. Public/employee/building occupant relations

g. Pre-inspection planning and review of previous inspection records

h. Inspector for friable and non-friable ACM and assessing conditions

i. Bulk sampling

j. Respirator protection and personal protective equipment

k. Recordkeeping and writing the inspection report

l. Regulatory review

m. Field trip and hands-on training

n. Course review and written examination

6.2.3 Control

Any maintenance or renovation operations involving ACM must be approved by the asbestos program manager and the Radiation and Safety department. The following steps dictate the procedures for any maintenance operation performed at the WVDP:

a. Person requesting the work that involves or may involve ACM, should contact the Asbestos Program Manager or a member of the Asbestos Management Working Committee before work is begun.

b. The Asbestos Program Manager, or designee or certified asbestos inspector, will check the buildings' asbestos records for information about the presence of ACM where work is to be performed and also physically inspect and document the area in question.

c. If no asbestos is present, an IWP and/or RWP is issued and the planned actions can proceed.

d. If ACM is present in the area, properly trained workers will repair, encapsulate, or remove the ACM as required per SOP 15-44 or SOP 15-55, or appropriate work orders.

6.2.4 Work Practices

NOTE *Throughout all the mentioned processes, only certified asbestos personnel can perform the necessary response actions wearing personal protection equipment including respiratory protection.*

A. Cleaning Activities

It is important that proper cleaning practices be implemented and subsequently utilized for the following reasons:

- Any building with friable ACM may be contaminated with fibers released by previous disturbance or deterioration of the ACM.

- Cleaning conducted in a careless manner could cause damage to the ACM, thereby releasing more fibers.

Generally, special cleaning practices are appropriate where asbestos-containing surfacing material or ACM thermal system insulation are located within a building.

It is important to note that use of dry brooms, mops, dust cloths and/or standard vacuum machines could resuspend previously settled fibers and raise the level of asbestos in the air. Dusting and mopping activities in the areas of concern should be conducted using wet cleaning techniques (mops or cloths dampened with water) or with vacuum cleaners equipped with HEPA filters. Cleaning activities can be divided into the following categories:

1. Initial cleaning
2. Emergency cleaning (fiber release episode)

The protective equipment and disposal practices are generally the same for these categories as discussed below.

All nonradioactively contaminated waste generated in this effort shall be disposed of as asbestos waste including any liquid wastes. Radioactively contaminated asbestos wastes should be handled as radioactive waste, in accordance with existing WVNS procedures.

a. <u>Initial Cleaning</u>

The purpose of the initial cleaning is to remove previously released asbestos debris from the facility. This includes both visible debris and asbestos fibers which are not visible and have been spread throughout the facility.

The initial cleaning must be conducted before initiation of any response actions (other than O&M activities) in buildings where friable or friable-suspected ACM is present, and where damaged or significantly damaged thermal insulation is present. The following guidelines should be considered when cleaning activities are to take place:

- Prior to initiation of this cleaning, a radiological survey shall be required to determine the need for a Radiological Work Permit (RWP).

- Cleaning personnel shall wear PPE per IWP and/or RWP during initial cleaning and whenever they will be contacting ACM during subsequent cleaning.

- Curtains, books, upholstered furniture, carpets and other irregular surfaces should be vacuumed with a HEPA-vacuum cleaner.

- All other floors should be wet-mopped, and all other horizontal surfaces such as tops of light fixtures and file cabinets should be wiped with damp cloths. Alternatively, these surfaces can be HEPA-vacuumed.

- Cleaning materials (mop heads, cloths, and HEPA filters) should be discarded as asbestos waste. HEPA filters should be removed from vacuum cleaners with care and following manufacturer's instructions for such filter removal.

- Ladders, mops, buckets, vacuum cleaners, and all cleaning equipment should be washed or wiped with damp cloths when the cleaning has been completed. Cloths should be discarded as described above.

b. Emergency Cleaning - Fiber Release Episodes

The main goal in responding to a fiber release episode is to minimize or prevent exposure by unprotected personnel to asbestos fibers.

Upon discovery of the fiber release episode, WVNS appropriate personnel should be notified, and if necessary, EA will contact the NYSDOL Program Manager's Office, in Albany, New York, via telephone to request permission to proceed with the appropriate response action.

All asbestos activities performed by WVNS personnel shall follow procedures outlined in WVNS SOPs 15-44, "Asbestos Removal - Minor Projects," and 15-55, "Asbestos Removal - Small and Large Projects," and/or in applicable work orders.

In general, when responding to an asbestos fiber release episode, the affected area should be evacuated, isolated and roped off. Warning signs should be posted as necessary to prevent persons not involved in the cleanup operations from inadvertently entering the area. If asbestos fibers could enter the HVAC system, the system should be shut down and/or sealed off as

necessary upon approval of Facility Manager and/or Radiation Protection.

The damaged ACM should be repaired/encapsulated with asbestos free materials and/or removed. An evaluation of the disturbance may be necessary to determine if other response actions are necessary.

The affected area shall not be re-occupied until it is released by final visual inspections and/or final clearance air monitoring. When releasing the area by visual inspection, a final visual inspection should be conducted by a certified asbestos supervisor from the work group and independently verified by a certified supervisor from the IH&S Department. When releasing the area by final clearance air monitoring, the results shall be considered satisfactory when every sample demonstrates airborne concentration of asbestos fibers of <0.01 fibers/cc (when using PCM microscopy) or <70 structures/mm^2 (when using TEM microscopy). However, the IH&S Department Manager shall have final responsibility for allowing the affected area to be re-occupied. Approval by the Radiation Protection Manager may also be required if the area contains radioactive materials.

B. Abatement Activities

All abatement activities performed by WVNS personnel shall follow procedures outlined in WVNS SOPs 15-44, "Asbestos Removal - Minor Project", SOP 15-55, "Asbestos Removal - Small and Large Projects", and/or applicable work orders.

6.2.5 Worker Protection

The worker protection program includes engineering controls, personal monitoring, medical surveillance, and personal protection.

Engineering controls shall be used, as applicable, in all operation involving ACM. These engineering controls include the use of wet methods, HEPA vacuuming, prompt cleanup and dispose of wastes, local exhaust ventilation equipped with HEPA filter dust collection, enclosure or isolation of processes producing dust, and ventilation of the work area. The following work practices shall not be used: High speed abrasive disc saw not equipped with HEPA filtered exhaust; compressed air to remove asbestos; dry sweeping or dry cleaning dust and debris containing ACM.

Personal protective equipment shall be used per IWP and/or RWP.

IH&S should perform air monitoring as required to ascertain the PELs are not exceeded.

6.2.6 Periodic Surveillance

ACM in the Building is required to be reinspected. Periodic reinspection of the ACM must be performed at least every three years after this management plan takes effect. The ACM identified in the plan must be visually inspected. Any changes in the condition of the ACM as designated in the plan must be reported to the asbestos program manager and recorded on the field forms. Reinspections shall be performed by accredited inspectors and must include the visual inspection and reassessment of ACM. Specifically, materials that were classified nonfriable must be reinspected to determine if they have been become friable. The accredited inspector must sign this new information and present it to the asbestos program manager.

6.2.7 Recordkeeping

For each asbestos project performed at WVDP, the following information must be recorded and maintain in accordance with WVDP-262 "WVNS Manual for Records Management and Storage" for at least 30 years:

A. the name, address, social security number, and NYS asbestos certificate number of the person who supervised the asbestos project;

B. the location and description of the asbestos project;

C. the amount of asbestos removed, enclosed, encapsulated, disturbed or handled;

D. the commencement and completion date of the asbestos project

E. the name and address of the deposit or waste disposal site or sites where the asbestos waste material was deposited or disposed of;

F. the name and address of any sites that were used for interim storage of asbestos waste prior to final deposit or disposal;

G. the name and address of any transporters that were used to transport the asbestos material;

H. The name and address, social security number and asbestos license or certificate of all persons who were engaged on that portion of the asbestos project for which the contractor has responsibility;

I. personal monitoring information, such as the date of measurement; sampling and analytical methods used and evidence of their accuracy; number, duration, and results of the samples taken; type of protective devices used, if any, and name, social security number, and exposure of the employees whose exposures are represented

7.0 RECORDS MAINTENANCE

7.1 Lifetime quality assurance records generated as a result of implementing this manual are identified as follows:

7.1.1 ACM Inspection Data Sheet

7.1.2 NESHAP's 10 Day Notification of Demolition and Renovation, if applicable.

7.1.3 Asbestos Project Notification, if applicable.

7.1.4 WVNS Environmental Affairs Regulatory Contact Report, if applicable.

7.1.5 3-year ACM Reinspection Data Sheet, WV-1565.

7.2 Records identified in steps 7.1.1 and 7.1.5 are on Plant Engineering's Records Inventory and Disposition Schedule (RIDS).

7.3 Records identified in steps 7.1.2, 7.1.3, and 7.1.4 are on Environmental Affair's Records Inventory and Disposition Schedule (RIDS).

FC1> 7.4 Records shall be prepared, maintained, and transferred to Records and Configuration/Document Control for storage in accordance with WVDP-262.

8.0 APPLICABLE DOCUMENTS

8.1 DOE memorandum EH-341, dated April 25, 1988, Asbestos Management.

8.2 DOE order 5480.10, latest issue, Environmental Protection Safety and Health Protection Standard.

8.3 OSHA 29 CFR 1910.1001 - General Industry Standard - Asbestos, Tremolite, Anthophyllite, and Actinolite

8.4 OSHA 29 CFR 1926.1101 - Construction Industry Standard - Asbestos, Anthophyllite, and Actinolite.

8.5 EPA-40 CFR 61.139, Subpart M, National Emission Standard for Asbestos

8.6 EPA 40 CFR 763, Subpart E - Asbestos - Containment Materials in Schools as Prescribed by DOE.

8.7 WVDP-026, The Occupational Health Manual

8.8 Asbestos Inspection Report, Dated 1994/1995

8.9 SOP 15-44, Asbestos Removal - Minor Projects

8.10 FHS-IH-3, Operating Procedure for Quantitative Respirator Fit Testing for Asbestos Workers.

8.11 WVDP-103, Environmental Compliance Manual

8.12 WVDP-112, Transportation Compliance Manual

8.13 SOP 15-55, Asbestos Removal - Small and Large Projects

9.0 ATTACHMENTS

9.1 Attachment A - WV-1178, Asbestos Workers Respiratory Protection Training Program Qualification Record (Example)

9.2 Attachment B - Field Form

9.3 Attachment C - EPA Notification Form

9.4 Attachment D - DOL Asbestos Project Notification Form

9.5 Attachment E - WVNS EA Regulatory Contact Report

9.6 Attachment F - WV-1565, Asbestos Warning Labels Inspection Checklist, (latest revision)

SEE EHS-TH-3 FOR LATEST REVISION

ASBESTOS HANDLER OR LEAD WORKER
RESPIRATORY PROTECTION TRAINING QUALIFICATION RECORD

Name: _____

Social Security No.: _____ Date: _____

Company/Department: _____ Job Title: _____

Asbestos Handler [ ] Yes [ ] No Lead Worker [ ] Yes [ ] No

Asbestos Handler Certificate No.: _____ [ ] N/A

==========

A. Medical

I have examined the above named individual and find him/her physically and psychologically fit to perform work where respiratory protection devices must be worn. If respirator restricted, list restrictions on bottom of this form.

Restrictions: [ ] Yes [ ] No Date of Medical Evaluation: _____

_____
Employee Health Services Date

==========

B. Asbestos Handler or Lead Worker

I have been trained, understand, and will comply with all applicable procedures and requirements of the respiratory protection program at the WVDP.

_____
Trainee Date

==========

C. Training Coordinator

1. The above named individual has successfully completed the training requirements to be currently certified as an Asbestos Handler per NY State Code Rule 56.

   [ ] Yes [ ] No [ ] N/A _____
   Date of Completion

2. The above named individual has completed the classroom portion of the WVDP respiratory protection qualification training program.

   [ ] Yes [ ] No _____
   Date of Completion

ASBESTOS HANDLER OR LEAD WORKER
RESPIRATORY PROTECTION TRAINING QUALIFICATION RECORD
(continued)

C. Training Coordinator (continued)

3. The above named individual has successfully practiced and satisfactorily demonstrated the use of the following respirator(s):

MSA Ultravue/Ultra-Twin _____ _____
Date of Completion

Scott Model 66 _____ _____
Date of Completion

_____
Training Coordinator Date

==========

D. Respirator Fit Testing

The above named individual has been successfully fit tested for and is qualified to use the following respirator(s):

MSA Ultravue/Ultra-Twin _____ _____
[ ] small [ ] medium [ ] large Date of Fit Test

Scott Model 66 _____ _____
[ ] small [ ] medium [ ] large Date of Fit Test

Respiratory Protection Qualification Designation: _____

_____
Radiation Protection Date

==========

Restrictions:

==========

N/A if not applicable

SEE FHS-IH-3 FOR LATEST REVISION

ACM INSPECTION DATA SHEET

SURVEYED BY: _____ DATE: _____ SHEET ___ OF ___

BLDG/AREA: _____ SPACE NAME: _____

SPACE No: _____ SPACE PREVIOUSLY INSPECTED? ___ YES ___ NO IF YES, COMPLETE NEXT LINE

DATE LAST INSPECTION: _____ SURVEYED BY: _____ DATA LOGGED ON SHEET ___ OF ___

INSULATION OR MATERIAL TYPE	LINE OR EQUIPMENT ID NUMBER OR HOMOGENEOUS AREA	MATERIAL COMPOSITION: CONFIRMED ACM	MATERIAL COMPOSITION: FIBERGLASS/FOAM	MATERIAL COMPOSITION: UNKNOWN/SUSPECT	BULK SAMPLING (USE APPENDIX "E" OF SOP 15-44 TO LOG BULK SAMPLE INFORMATION, AND ATTACH IT TO THIS DATA SHEET): BULK SAMPLE ID NUMBER	LAB ANALYSIS RESULTS: ACM	LAB ANALYSIS RESULTS: NON-ACM	QUANTITY OF MATERIAL	CONDITION	MATERIAL ASSESSMENT: IS MATERIAL FRIABLE?	MATERIAL ASSESSMENT: POTENTIAL FOR DISTURBANCE	MATERIAL ASSESSMENT: PRIORITY	RESPONSE ACTIONS: REMOVAL	RESPONSE ACTIONS: REPAIR/ENCAPSUL'N	RESPONSE ACTIONS: O & M	RESPONSE ACTIONS: TYPE OF LABEL ON INSULATION

CODES

MATERIAL TYPE:

BI - BOILER INSULATION
CT - CEILING TILE
CS - CEILING SURFACING
DI - DUCT INSULATION
EG - EQUIPMENT GASKET
EJ - EXPANSION JOINT
EW - ELECTRICAL WIRING
FD - FIRE DOOR
FI - FITTING INSULATION
FT - FLOOR TILE
PI - PIPE INSULATION
RD - ROOF DRAIN INS.
RF - ROOF FLASHING
RM - ROOFING MATERIAL
TI - TANK INSULATION
VI - VALVE INSULATION
WS - WALL SURFACING
OT - OTHER

MATERIAL ASSESSMENT:

G - GOOD
D - DAMAGED
SD - SIGNIFICANTLY DAMAGED
Y - YES
N - NO
H - HIGH
M - MODERATE
L - LOW

HOMOGENEOUS AREA:

TSI - THERMAL SYSTEM INSULATION
SM - SURFACING MATERIAL
MM - MISCELLANEOUS MATERIAL

REMARKS: _____

Attachmen

NESHAP'S 10 DAY NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project	Postmark	Date Received	Notification

I. Type of notification (O - Original R - Revised C - Cancelled)

II. Facility information (Identify owner, removal contractor, and other operator)

Owner name:		
Address:		
City:	State:	Zip:
Contact:		Tel:
Removal contractor:		
Address:		
City:	State:	Zip:
Contact:		Tel:
Other operator:		
Address:		
City:	State:	Zip:
Contact:		Tel:

III. Type of operation (D - Demo O - Ordered Demo R - Renovation E - Emergency Renovation)

IV. Is asbestos present? (Yes/No)

V. Facility description (Include building name, number and floor or room number)

Bldg. name:		
Address:		
City:	State:	County:
Site location:		
Building size:	# of Floors:	Age in Years:
Present use:	Prior Use:	

VI. Procedure, including analytical method, if appropriate, used to detect the presence of asbestos material:

VII. Approximate amount of asbestos, including:

	ACM To Be Removed	Nonfriable asbestos material not to be removed		Indicate unit of measurement below	
		Cat. I	Cat. II	Unit	
1. Regulated ACM to be removed 2. Category I ACM not removed 3. Category II ACM not removed					
Pipes				Ln Ft:	Ln In:
Surface Area				Sq Ft:	Sq In:
Vol ACM off facility component				Cu Ft:	Cu In:

VIII. Scheduled dates asbestos removal (mm/dd/yy) Start: Complete:

IX. Scheduled dates demo/renovation (mm/dd/yy) Start: Complete:

X. Description of planned demolition or renovation work and methods(s) to be used:

XI. Description of work practices and engineering controls to be used to prevent emissions of asbestos at the demolition and renovation site:

XII. Waste Transporter #1:
Name:
Address:
City: State: Zip:
Contact Person: Tel:

Waste Transporter #2:
Name:
Address:
City: State: Zip:
Contact Person: Tel:

XIII. Waste disposal site:
Name:
Location:
City: State: Zip:
Telephone:

XIV. If demolition ordered by a government agency, please identify the agency below:
Name: Title:
Authority:
Date of order (mm/dd/yy): Date ordered to begin (mm/dd/yy):

XV. For emergency renovations:
Date and hour of emergency (mm/dd/yy):
Description of the sudden, unexpected event:

Explaination of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. Description of procedures to be followed in the event that unexpected asbestos is found or previously nonfriable asbestos material becomes crumbled, pulverized, or reduced to powder.

XVII. I certify that an individual trained in the provisions of this regulation (40 CFR Part 61, Subpart M) will be on-site during the demolition or renovation and evidence that the required training has been accomplished by this person will be available for inspection during normal business hours. (Required 1 year after promulgation).

(Signature of Owner/Operator) (Date)

XVIII. I certify that the above information is correct.

(Signature of Owner/Operator) (Date)

STATE OF NEW YORK - DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
ASBESTOS CONTROL BUREAU
State Office Campus
Building 12 - Room 454
Albany, N.Y. 12240

ASBESTOS PROJECT NOTIFICATION

AMENDED NOTIFICATION

a. ☐ Postponed ☐ Cancelled
b. New Start Date _____
c. New End Date _____
d. Submitted By

Refer to Information Sheet or Code Rule 56 for Time Deadlines

EMERGENCY NOTIFICATION REQUESTED

a. Date of Request | b. Time of Day

c. Name of Person Granting Request

WITHIN TWO WORKING DAYS OF TH EMERGENCY APPROVAL you must sub duplicate copies of this form with t appropriate fee to the Asbestos Cont Bureau at the address shown.

1. NAME AND ADDRESS OF CONTRACTOR

2. FEDERAL EMPLOYER IDENTIFICATION NO.

3. ASBESTOS LICENSE NO.

4. MAILING ADDRESS. (If different than listed in ITEM 1)

5. NAME AND ADDRESS OF PARTY FOR WHOM THE PROJECT IS BEING PERFORMED

6. a. NAME AND TITLE OF DULY AUTHORIZED REPRESENTATIVE

b. TELEPHONE NO. ( )

PROJECT INFORMATION

PROVIDE ALL INFORMATION REQUESTED FOR THE BUILDING/SITE AT WHICH THE ASBESTOS PROJECT WILL BE CONDUCTED.

7. ADDRESS (INCLUDE NAME OF BUILDING, ROOM NO., CITY, TOWN, VILLAGE)

8. NAME OF BUILDING OWNER

9. COUNTY

10. CURRENT USE OF BUILDING

11. AGE OF BUILDING

12. TOTAL CONTRACT AMOUNT

13. PROJECT DATE(S) - List phased project dates in REMARKS (Item 28)

a. ACTUAL STARTING DATE _____

b. PROJECTED ENDING DATE

14. TYPE OF ASBESTOS WORK (*CHECK ALL WHICH APPLY*)

☐ Pipe Related
☐ Sprayed on Insulation
☐ Roofing/Flashing
☐ Vessel Covering
☐ Siding
☐ VAT
☐ Demolition
☐ Other (Specify) _____

15. WILL WORK ON THE PROJECT BE CONDUCTED UNDER A VARIANCE? If yes, specify the type of variance:

☐ APPLICABLE VARIANCE - NO.: _____
☐ INDIVIDUAL VARIANCE - PETITION NO.: _____

16. WILL SUBCONTRACTORS BE USED ON THE PROJECT? ☐ NO ☐ YES

If yes, please list name and federal employer identification number of eac subcontractor in REMARKS (Item 28) on reverse of form.

17. ASBESTOS PROCEDURE(S) TO BE USED (*CHECK ALL WHICH APPLY*)

☐ REMOVAL
☐ ENCLOSURE
☐ ENCAPSULATION
☐ OTHER (Specify) _____
☐ DEMOLITION
☐ DISTURBANCE
☐ HANDLING

18. TYPE OF ASBESTOS MATERIAL

☐ FRIABLE
☐ NON-FRIABLE

19. AMOUNT OF ASBESTOS INVOLVED - *CHECK ALL APPLICABLE BOX(ES)*

LINEAR FEET	SQUARE FEET
☐ Less than 260 _____ (Specify)	☐ Less than 160 _____ (Specify)
☐ ($100) 260-422	☐ ($100) 160-259
☐ ($200) 430-824	☐ ($200) 260-499
☐ ($500) 825-1649	☐ ($500) 500-999
☐ ($1000) 1650 OR MORE	☐ ($1000) 1000 OR MORE
_____ (Specify)	_____ (Specify)

20. METHODS TO BE USED AT PROJECT SITE TO PREVENT ASBESTOS DISSEMINATION (INCLUDING TYPE OF EQUIPMENT AND VENTILATION SYSTEMS USED)

21. I verify that the information specified on this notification is true and accurate and that the project will be conducted in compliance with the requireme of Code Rule 56.

a. *Signature of the Contractor or Duly Authorized Representative* _____ b. *Date* _____

PREPARE THIS APPLICATION IN TRIPLICATE AND SUBMIT:

- An original and one copy (with an ink signature on both copies) to the New York State Department of Labor, Division of Safety and Health, Asbestos Control Bureau, State Office Campus, Building 12-Room 454, Albany, NY 12240; *retain one copy for your records.*
- A certified check or money order, made payable to the Commissioner of Labor, for the fee due based on the project size as shown in item 19. *This notification must be submitted at least 10 days prior to the starting date of the asbestos project.*

22. METHOD(S) TO BE USED AT PROJECT SITE TO TREAT OR DISPOSE OF CONTAMINATED WASTE WATER (IF APPLICABLE)

23. NAME AND ADDRESS OF WASTE DISPOSAL SITE, IF ANY	24. NAME AND ADDRESS OF WASTE HAULER/TRANSPORTER, IF ANY

25. METHOD(S) TO BE USED AT WASTE DISPOSAL SITE (IF APPLICABLE)

26. LIST ALL EQUIPMENT TO BE USED FOR THIS ASBESTOS PROJECT, e.g. NEGATIVE AIR FILTRATION UNITS, RESPIRATORS, WETTING DEVICES, HEPA VACUUMS, ETC. DO NOT INCLUDE NON-ASBESTOS RELATED EQUIPMENT OR EXPENDABLE SUPPLIES. (ATTACH ADDITIONAL SHEETS IF NECESSA

DESCRIPTION OF EQUIPMENT	MANUFACTURER	MODEL NUMBER	QUANTITY

27. LABORATORY ANALYSIS TO BE PERFORMED BY:

a. NAME	b. ELAP REGISTRATION NUMBER

28. REMARKS

WEST VALLEY NUCLEAR SERVICES INC.
ENVIRONMENTAL AFFAIRS
REGULATORY CONTACT REPORT

[ ] Incoming Call [ ] Outgoing Call [ ] Returning Call	Placed By: Received By:	Agency: Phone Number:
Date/Time of Contact:	Call Received By: Extension	
Subject:		
Information:		
Actions Required As a Result of the Contact:		
Signature of Person Documenting Contact:		Date:

Distribution:

DOE, E. A. Matthews	MS-DOE
Mgr., Environmental Arrairs	MS-AA4
Mgr., Regulatory Compliance	MS-AA4
RC File 1.2.10	MS-WV-AA4

Others: _____
_____
_____

3-YEAR ACM REINSPECTION DATA SHEET

MATERIAL LOCATION/ASSESSMENT & RESPONSE ACTIONS

DATE:_____ INSPECTOR(S):_____ BLDG/AREA:_____

SPACE #	TYPE OF MATERIAL	QUANTITY OF MATERIAL		MATERIAL ASSESSMENT				RESPONSE ACTION			TYPE OF LABEL ON MATERIAL
		TOTAL	DAMAGED	CONDITION OF MATERIAL	IS MATERIAL FRIABLE?	POTENTIAL FOR DISTURBANCE	PRIORITY	REMOVAL	REPAIR	O & M	

CODES: DT = DUCT INS.; EG = EQ. GASKET; EJ = EXP. JOINT; FD = FIRE DOOR; FI = FITTING INS.; FT = FLOOR TILE; PI = PIPE INS.; RF = ROOF FLASHING; RM = ROOF MAT.; TI = TANK INS.; VI = VALVE INS.; OT = OTHER; G = GOOD; D = DAMAGED; SD = SIGNIFICANTLY DAMAGED; Y = YES; N = NO; H = HIGH; M = MODERATE; L = LOW

REMARKS:_____

WVNS RECORD OF REVISION

Rev. No.	Description of Changes	Revision On Page(s)	Dated
0 - Draft C	Original Issue	All	05-90
0	Editorial Changes	All	06-90
1	Editorial Changes	All	11-91
2	Added Attachment G & Editorial Changes	8, 55, 56, 69, G-1	01-93
3	Editorial Changes in Section 6.4.C, Pages 64 & 65.	All	06-93
4	General Revision	All	05-01-96
5	Tables 5.2.1, 5.2.2 and some tables 5.2.3.1-5.2.3.28 have changed. Sites asbestos inventory was updated and a Records Maintenance section added. Editorial changes.	All	10/26/99
FC1	Procedure was modified in response to DOE Surveillance S03-001E. Editorial changes were also made to comply with WVDP-257.		12/03/02
	Detailed changes are as follows:		
	Updated cover page to latest version, updated Cognizant Manager.	1	
	Table of Contents updated to reflect FC.	2-3	
	4.9.4 - updated department title.	10	
	5.1.2 WARNING - added warning that materials that could possibly contain ACM should be treated as ACM until proven otherwise.	11	
	5.1.2 NOTE - added note to explain the bulk sampling of roofs will be performed.	11	
	5.2 - added that tables do not include all roofing materials, added process knowledge as a means for proving material not ACM.	15	
	7.4 - updated department title.	79	
	PCDOCs number removed throughout, tabs reset, Record of Revision updated to latest version, repaginated.	All	
	This change affects the Asbestos Cognizant Engineer and Maintenance.		

WVNS RECORD OF REVISION CONTINUATION FORM

Rev. No.	Description of Changes	Revision On Page(s)	Dated
FC2	Corrected typographical error in NOTE. This change has no affect on any department.	11	12/06/02