



R3/C122

Ex. 6

November 8, 1994

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Docket: 070-00036

Gary Stout
Occupational Safety and Health Administration
911 Washington Avenue, Room 420
St. Louis, MO 63101

Dear Mr. Stout,

We have received and investigated Complaint No. 74180357, whose specific hazard allegations included:

1. Employees are removing asbestos from a barn without proper protective clothing and equipment.
2. Employees have not been trained in 40-hour course for asbestos removal.
3. Employees are not bagging asbestos.

Those allegations address work that was done to upgrade our Emergency Operations Center (EOC), which is located in an historic barn on our property at 3300 Highway P, Hematite, MO. The wall panels in the barn were identified as being constructed of Transite during an asbestos survey conducted several years ago. We therefore contacted Peter Ironwood of the Missouri Department of Natural Resources (MDNR), and Tom Briggs of Missouri OSHA (MOSHA) on or around January 20, 1994 when the EOC upgrades were being planned.

In response to allegations 1 and 2, MDNR and MOSHA informed us that the removal of Transite boards would not constitute an asbestos abatement project if the boards were kept reasonably intact. Both agencies felt that training our employees in asbestos abatement requirements was not necessary if we used acceptable work practices. We therefore planned to minimize breakage of the Transite, wet Transite that did break, and require the use of full face air purifying respirators and Tyvek suits. MOSHA also recommended that we perform air monitoring to ensure compliance with the applicable permissible exposure limits. SITEX Environmental, an industrial hygiene contractor, was hired to perform that monitoring. We again reviewed our plans with MOSHA on August 8. They agreed with our approach, and indicated that personal protective equipment requirements could be relaxed if the monitoring showed that exposures were kept below 0.2 fibers/cc for an 8-hour time weighted average, and below 1 fiber/cc for a 30-minute

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Act, exemptions 6
FOIA 2007-0234

ABB Combustion Engineering Nuclear Fuel

Combustion Engineering, Inc.

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excursion limit. Employees doing the removal work performed essentially the same tasks, so only one employee was monitored. The enclosed reports from Centurion Analytical Laboratory, a SITEX subcontractor, show that personal protective equipment was not required to meet the prescribed exposure limits. Our employees were allowed to work without their Tyvek suits after those reports were received, but we encouraged the use of respirators for the duration of the project. Half face air purifying respirator typically were worn because of non-asbestos dust that became airborne as the ceiling was removed.

In response to allegation 3, MDNR told us to contact our waste hauler for handling, packaging, and hauling instructions. They also requested that we send them a written notice before starting the work. Steve Miller of BFI, our waste hauler, was also contacted on or around January 20. Mr. Miller stated that BFI would remove and bury the asbestos panels in a St. Louis County landfill that was licensed for asbestos disposal. BFI provided us with a 20 cubic yard dumpster and enough plastic to make a double lining, and advised us to place the Transite panels in the dumpster without any bagging or packaging. The MDNR's notice was sent on August 5, and work commenced on August 15. The liner layers were separately pulled together and sealed after the dumpster was filled. BFI covered the dumpster with a tarp before its removal on September 1.

We believe that the work associated with our removal of the barn's Transite panels was conducted safely and in a manner that was consistent with MDNR and MOSHA requirements. Appropriate personal protective equipment was used, our personnel did not receive 40-hour asbestos abatement training because this was not an abatement project, and the Transite panels were appropriately packaged.

Please call me at (314) 937-4691 if you have any further questions on this matter.

Sincerely,

Robert W. Sharkey
Manager, Regulatory Compliance

RWS\krh
RCM10255

cc: George France, Inspector
NRC Region III

David Harris, Chief Steward
District 9, International Association of Machinists and Aerospace Workers
AFL/CIO



Centurion
Analytical
Laboratory

AGS Combustion

NAME: Engineer

LOCATION: Tile Room

PROJECT NO: 8107

SAMPLE NO.	3107-006	3107-007	3107-008	3107-009	3107-010
LOCATION ^{Ex. 6}	E. ROOM W/ BENCHES	BENCH ON SOUTH WALL IN EAST ROOM W/ BENCHES	EAST ROOM W/ BENCHES	EAST ROOM W/ BENCHES	EAST ROOM W DESKS AND ALUM. SYSTEM
INSIDE/OUTSIDE	I	I	I	I	I
TYPE	PERSONAL	AREA	PEAK	PERSONAL	PERSONAL
DATE	8/15/94	8/15/94	8/15/94	8/15/94	8/15/94
PUMP NO.	38	17	38	38	38
START TIME	0810	0730	1220	1250	1415
BEG. FLOW RATE	2.0	2.0	2.0	2.0	2.0
STOP TIME	1100	1440	1250	1340	1440
END FLOW RATE	2.0	2.0	2.0	2.0	2.0
AVG. FLOW RATE	2.0	2.0	2.0	2.0	2.0
TOTAL TIME (MIN)	170	450	30	50	25
VOLUME (LITERS)	340	860	60	100	50
INITIALS	SLD	SLD	SLD	SLD	SLD
FIBERS/CC	0.106	0.024	<0.080	0.062	0.211
ANALYST	EAG				7
NOTES:					



Centurion
Analytical
Laboratory

NAME: NBB Combustion
Engineer

LOCATION: Tile Room

PROJECT NO: 3107

SAMPLE NO.	807-11	8107-12			
LOCATION	BLANK	BLANK			
INSIDE/OUTSIDE					
TYPE	BLANK	BLANK			
DATE					
PUMP NO.					
START TIME					
BEG. FLOW RATE					
STOP TIME					
END FLOW RATE					
AVG. FLOW RATE					
TOTAL TIME (MIN)					
VOLUME (LITERS)					
INITIALS	SJD	SJD			
FIBERS/CC	0 Fibers	0 Fibers			
ANALYST	EAB	→			
NOTES:					