



DEPARTMENT OF THE ARMY  
WALLA WALLA DISTRICT, CORPS OF ENGINEERS  
WALLA WALLA, WASHINGTON 99362-9265

9105169

October 25, 1991

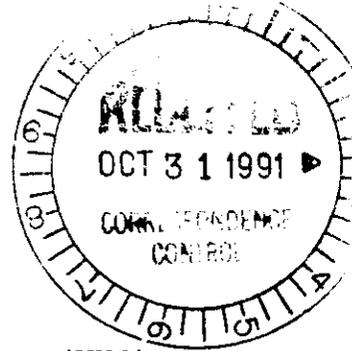
REPLY TO  
ATTENTION OF:

Hanford Program Office

Serial Letter 92PM006

Subject: Task Order DE-AT06-90RL12103 Under Master Interagency Agreement No. DE-AI06-90RL12074; 1100-EM-1 Operable Unit Remedial Investigation/Feasibility Studies, Test Pit Excavation at Horn Rapids Landfill

Ms. E.A. Bracken, Director  
Environmental Restoration Division  
U.S. Department of Energy Field Office, Richland  
P.O. Box 550, MSIN A5-19  
Richland, Washington 99352



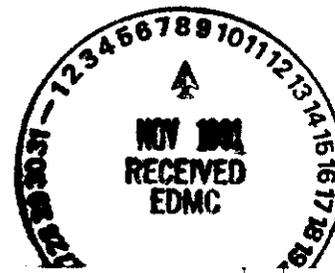
Dear Ms. Bracken:

This letter addresses a Westinghouse Hanford Company (WHC) concern regarding applicability of WAC 296-65-001 through 045, "Asbestos Removal and Encapsulation" to the characterization work being performed at Horn Rapids Landfill and provide direction on performance of that work. The specific concern is that WAC 296-65 would require the 32 hour Certified Asbestos Worker training for all persons working within the exclusion zone, and that any asbestos encountered must be disposed of in an approved asbestos landfill.

The U.S. Army Corps of Engineers (USACE) has contacted state and local governmental agencies regarding these two issues. We have been informed that the training and disposal requirements do not apply to characterization activities such as the one at Horn Rapids Landfill.

Ms. Ann Soiza (Assistant to Program Manager, Washington State Department of Labor and Industries) stated that WAC 296-65 was intended for asbestos abatement work and did not apply to the characterization work in question. She indicated that the four hour "Asbestos Awareness" class would be appropriate training for this work (Enclosure 1).

Mr. Jim Catalano (Asbestos Program Supervisor, Washington State Department of Labor and Industries) stated that disposal of asbestos is under the jurisdiction of the Department of Ecology, which in turn delegates authority to the local Air Pollution Control agency. For the 1100-EM-1 Operable Unit, the Air Pollution Control Authority in Richland would have jurisdiction over asbestos disposal. Mr. Catalano also noted that the asbestos abatement regulations should not apply to the work being performed at Horn Rapids Landfill.



Mr. Phil Cook (Benton-Franklin and Walla Walla Counties Air Pollution Control Authority) has stated that asbestos material encountered during test pit excavation at Horn Rapids Landfill will not require bagging and disposal in an approved asbestos landfill, and may be returned to the test pits (Enclosure 2).

Asbestos encountered during testpit excavation will be sprayed with water to dampen the material and eliminate airborne emissions. Excavated material will be stockpiled on plastic sheeting and the stockpiles have water applied during excavation operations. Stockpiles will be covered with plastic sheeting to prevent drying when excavation is not taking place. Excavated material will be returned to the testpits.

If there are any questions or need for further clarification please contact me on 509-376-9101, or Wendell Greenwald at 509-376-1252.

Sincerely,

*John T. Stewart*

John T. Stewart, P.E.  
Project Manager, 1100-EM-1 O.U.  
Hanford Program Office

Enclosures

Copies Furnished:

J. K. Erickson, DOE-RL  
R. D. Freeberg, DOE-RL  
R. D. Larson, DOE-RL  
R. K. Stewart, DOE-RL  
W. L. Greenwald, USACE

K. M. Singleton, WHC  
A. Soiza, WA Dept. of Labor & Industries  
J. Catalano, WA Dept. of Labor & Industries  
P. Cook, Benton-Franklin & Walla Walla Counties Air Pollution  
Control Authority

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: J. T. Stewart, Dept. of Army      Addressee: E. A. Bracken, RL      Correspondence No.: Incoming: 9105169

Subject: TASK ORDER DE-AT06-90RL12103 UNDER MASTER INTERAGENCY AGREEMENT NO. DE-AI06-90RL12104; 1100-EM-1 OPERABLE UNIT RI/FS, TEST PIT EXCAVATION AT HORN RAPIDS LANDFILL

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office	B3-01	X
		M. R. Adams	H4-55	X
		R. J. Bliss, Level 1	B3-04	X
		L. C. Brown	H4-51	X
		G. D. Carpenter	B2-16	X
		C. K. DiSibio	B3-03	X
		K. R. Fecht	H4-56	X
		M. J. Lauterbach	H4-55	X
		R. E. Lerch (Assignee)	B2-35	X
		P. J. Mackey	B3-15	X
		W. H. Price	N3-05	X
		G. E. VanSickle	R2-81	
		EDMC	H4-22	

