



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM FOR THE RECORD

SUBJECT: Meeting between Savannah River Nuclear Solutions (SRNS) and EPA regarding Asbestos Part 1: Chrysotile Asbestos; Proposed Regulation of Certain Conditions of Use Under Section 6(a) of the Toxic Substances Control Act (TSCA)

Date and Time: 10:00 a.m. EDT, May 25, 2023

EPA staff held a virtual meeting with SRNS representatives regarding the Asbestos Part 1 proposed rule. The meeting was held at EPA's request to discuss details of asbestos sheet gasket use at SRNS, as identified in SRNS's public comments (EPA-HQ-OPPT-2021-0057-0302 and EPA-HQ-OPPT-2021-0057-0478). SRNS stated that asbestos sheet gaskets are used in areas with high radiation. SRNS has investigated the use of non-asbestos alternatives since the 1990s without success of identifying equivalent substitutes. According to SRNS, radiation damages gasket material; hence the difficulty in finding durable alternatives. More durable gaskets result in a lower gasket replacement rate and, therefore, less worker exposure to radiation. Asbestos gaskets are used in various systems at SRNS: strong acid applications in waste vitrification; process water; tritium handling, and cooling water systems. SRNS has thousands of asbestos gaskets, based on maintenance records; it replaces about 300 to 400 asbestos sheet gaskets per year. Gaskets come to SRNS pre-packaged and labeled as containing asbestos. There are 139 workers on site who are qualified to replace asbestos sheet gaskets. P-100 air purifiers are the minimum level of protection used for any asbestos gasket work. However, in radioactive areas, workers will have higher level of protection: a positive air supply respirator and protective suits. Waste generated from asbestos gasket removal is radioactive and it is barreled and buried on site in a radioactive waste landfill. SRNS also noted that the DOE facility at Hanford, Washington, has some of the same operations as SRNS, and thus may also be using asbestos gaskets.

Attendees:

SRNS:

Lance W. Cramer, Environmental Compliance
Kim A. Wolfe, Air Permitting Subject Matter Expert
Jennifer Vrlik, Principal Industrial Hygienist

EPA:

Ana Corado, Chief, Risk Management Branch 3, ECRMD, OPPT
Peter Gimlin, Environmental Protection Specialist, RMB3, ECRMD, OPPT
William Silagi, Economist, ECRMD, OPPT