



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: 2:00 p.m. EDT, July 26, 2023

EPA staff held a virtual meeting with SRNS representatives at EPA's request to continue the discussion of asbestos sheet gasket uses at SRNS. Topics discussed included SRNS's supply of asbestos sheet gaskets and SRNS's need to continue ordering gaskets in the future. SRNS had limited information on the asbestos gasket supply but stated its operational need for asbestos sheet gaskets will continue. SRNS said its engineering group continues to work on the substitute material development. SRNS procures pre-cut gaskets and does not cut its own gaskets from sheets. Regarding worker protection, SRNS confirmed that the removal and replacement of gaskets is performed in compliance with OSHA 29 CFR 1926.1101 (Class III work), or sometimes Class II. Gasket flange cleaning is done by hand scraping only, using a wet method. Workers in radioactive areas must also comply with 10 CFR 835 and subsidiary regulations; these regulations can require a higher level of protection that is required by the OSHA asbestos regulations, such as another layer of coveralls, or a respirator with a higher applied protection factor (APF). Occasionally, radiation may prohibit air sampling, as the sample may be too radioactive for laboratories to handle, and/or the sampling equipment itself could become too contaminated to use again. In those situations, they can estimate/model exposure from other data. Otherwise, air monitoring is performed, and levels are below the OSHA PEL for asbestos. The minimum respiratory protection SRNS uses, which is a full-face air purifying respirator with a P-100 (HEPA) cartridge is rated at an APF of 50; SRNS does not use half-face respirators. When workers use higher protection due to radioactivity, the APF is 1,000 or 10,000, depending on suit required. EPA and SRNS discussed how long a typical gasket replacement takes; SRNS estimated 30 minutes if no issues; more if complications. SRNS assigns a minimum of two workers for the task, which is normal; up to 5 workers at most. Waste disposal procedures were also discussed.

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
Robert Courtnage, Team Leader, RMB3, ECRMD, OPPT
Peter Gimlin, Environmental Protection Specialist, RMB3, ECRMD, OPPT
William Silagi, Economist, ECRMD, OPPT