

**CONTROLLED DOCUMENT**

This copy is uncontrolled if no red stamp is present on printed copies. Users are responsible for ensuring they work to the latest approved revision.



**Los Alamos National Laboratory**


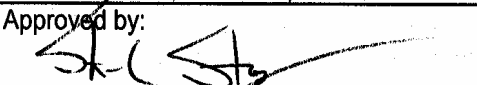

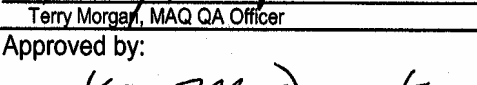
Risk Reduction and Environmental Stewardship Division

Meteorology and Air Quality Group (MAQ)

**Quality Assurance Project Plan**

for the

**Asbestos Report Task**

Prepared by:  Debra Archuleta, Asbestos Report Task Leader	Date: 5/14/03
Approved by:  Steve Story, Title V Implementation Team Leader	Date: 5/15/03
Approved by:  Terry Morgan, MAQ QA Officer	Date: 5/19/03
Approved by:  Jean Dewart, MAQ Group Leader	Date: 5/22/03

## General Information about this plan

Table of Contents	Section	Topic	Page No.
	<b>1</b>	<b>Quality Program</b>	<b>4</b>
		Organization	4
	<b>2</b>	<b>Personnel Development</b>	<b>7</b>
		Personnel Training and Qualification	7
	<b>3</b>	<b>Quality Improvement</b>	<b>8</b>
		Improving Project Quality	8
	<b>4</b>	<b>Documents and Records</b>	<b>10</b>
		Project Documents and Records	10
	<b>5</b>	<b>Work Processes</b>	<b>12</b>
		Planning and Performing Work	12
		5.2 Reporting Activities	14
		5.2.1 Annual Forecast Report	16
		5.2.2 Large Job Notification	18
		5.2.3 Demolition Notification	19
		5.2.4 Asbestos Waste Reporting	20
		5.2.5 Emergency Notification	22
		5.3 Inspection Activities	23
		5.3.1 Dumpster and Trailer Inspections	24
		5.3.2 Landfill Inspections	25
		5.3.3 Tracking New Jobs	26
		5.4 Technical Support Activities	27
	<b>6</b>	<b>Design</b>	<b>28</b>
		Project Design Activity	28
	<b>7</b>	<b>Procurement</b>	<b>28</b>
		Project Procurement	28
	<b>8</b>	<b>Inspection and Acceptance Testing</b>	<b>28</b>
		Project Supplies Inspection and Acceptance	28
	<b>9</b>	<b>Management Assessment</b>	<b>29</b>
		Internal Management Assessments	29
	<b>10</b>	<b>Independent Assessment</b>	<b>29</b>
		NMED Independent External Assessments	29

## General Information, continued

---

### Appendices

This plan has the following appendices:

Number	Appendix Title	No. of pages
A	Project Organization	1
B	Flowchart of Asbestos Management Process	1
C	References	1

### History of revision

This table lists the revision history of this plan.

Revision	Date	Description Of Changes
0	7/4/97	New document.
1	2/21/02	Revised to better reflect project work processes.
2	6/9/03	Updated organizational details and added lessons learned from an MSA and from a Notice of Violation.

## Section 1

# Quality Program

### Organization

---

**Purpose of this plan**

This Quality Assurance Project Plan (QAPP) is tiered to the MAQ Quality Management Plan, which, together with the implementing procedures, provides the requirements and processes that ensure the project effectively maintains LANL compliance with the project's areas of responsibility within all state and federal regulations governing visible airborne asbestos emissions, asbestos waste disposal, and reporting requirements.

This plan also demonstrates compliance with DOE Order 414.1A, "Quality Assurance."

---

**Scope of this plan**

This QAPP addresses the requirements that pertain to MAQ's role in the implementation of LIR402-570-01, "Asbestos." It does not address the processes in other organizations that have responsibilities as outlined in the LIR.

---

**Applicable regulations**

LANL is an applicable source for 40 CFR 61, Subpart M because, 1) demolition activities occur, and 2) asbestos renovation activities occur. This regulation is known as the Asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) and is found in Part 61.140 through Part 61.157 and in Appendix A of Subpart M. This CFR is further promulgated by Title 20, New Mexico Administrative Code, Chapter 2, Part 78, (20NMAC 2.78). The following paragraphs are specifically applicable to LANL.

40CFR 61.145

Standard for demolition and renovation:

All of 61.145 applies.

Notification requirements are given in paragraph (b).

40 CFR 61.150

Standard for waste disposal for all sources except asbestos mills:

All of Part 61.150 applies. Paragraph (e) sets the tone for our agreement with the NMED to provide quarterly waste reports.

*Continued on next page.*

## Organization, continued

---

<b>Applicable regulations, continued</b>	<p>40 CFR 61.154 <u>Standard for active waste disposal sites:</u> Response from Landfill Operator is needed to complete waste reporting. Auditing of Landfills is required by DOE/LANL to ensure proper disposal of hazardous wastes.</p> <p>40 CFR Part 61, Subpart M, Appendix A <u>Interpretive Rule Governing Roof Removal Operations</u></p> <p>DOE Order EH-413-062/1195 <u>Regulatory Requirements Affecting Disposal of Asbestos-Containing Waste</u></p>
<b>DOE Order 414.1A</b>	<p>Compliance with DOE Order 414.1A is a Department of Energy requirement, rather than a regulatory requirement. Compliance with this order is met by:</p> <ul style="list-style-type: none"><li>• Organization of this Quality Assurance Project Plan; each section of the QAPP addresses one of the 10 Criteria listed in DOE O 414.1A.</li><li>• The multi-level quality framework of the group; the group quality management plan is the enveloping document, followed by specific project plans listing project requirements, and then detailed procedures describing how work is performed.</li></ul>
<b>MAQ group organization</b>	<p>The Meteorology and Air Quality Group (MAQ) of the Risk Reduction and Environmental Stewardship (RRES) Division is responsible for the Asbestos Report Task at Los Alamos National Laboratory (LANL). See the MAQ Quality Management Plan (MAQ-QMP) for a description of the group organization and chain of authorities.</p>
<b>Project organization</b>	<p>The MAQ Asbestos Report Task Leader manages the operation of the Asbestos Report Task to ensure that project objectives are met. The Task Leader reports to the MAQ Title V Implementation Team Leader (Appendix A).</p>

## Organization, continued

---

**Other LANL groups** This project is operated in cooperation with the Industrial Hygiene Group (HSR-5) to monitor and control all aspects of asbestos removal in either Operations and Maintenance (O&M) work, or renovation/demolition activities. The responsibilities of HSR-5 are spelled out in LIR 402-570-01.

The day-to-day O&M work is generally performed by trained KBR/Shaw/LATA (KSL) workers. KSL is the LANL Support Services Subcontractor and is governed by the Laboratory's Asbestos Management Program Plan (AMP).

Other LANL Groups (e.g., ER, D&D) may frequently hire outside contractors to perform asbestos work or demolition work. In this case, these outside contractors will adhere to regulatory requirements for asbestos renovation and demolition work.

---

**Project deliverables** Asbestos Report Task deliverables consist mainly of the required notifications to the New Mexico Environment Department (NMED). Reports consist of at least the following:

- Annual forecast of expected maintenance activity
  - Special notifications throughout the year of large-scale renovation projects
  - Special notification throughout the year of any demolition projects
  - Quarterly reports to the NMED accounting for the disposal of all asbestos removed from LANL and DOE buildings and property.
- 

**Revising this plan** The Asbestos Report Task Leader, the Title V Implementation Team leader, the Quality Assurance Officer, and the MAQ Group Leader will approve all revisions to this plan.

## Section 2

### Personnel Development

#### Personnel Training and Qualification

---

**Personnel requirements and training**

Qualified Asbestos Report Task members will be hired and trained as prescribed in the MAQ QMP. Desirable experience or training includes AHERA Asbestos Building Inspector and/or AHERA Asbestos Contractor/Supervisor.

Thorough knowledge of database management and data entry is needed.

As required by the MAQ-QMP, all personnel performing project-related work are required to obtain appropriate training prior to performing work governed by a procedure. The Asbestos Report Task Leader will determine training needs. Training to a procedure constitutes authorization to perform the work. Training for MAQ personnel is performed and documented according to MAQ-024, "Personnel Training." Training of personnel in other organizations will be performed and documented according to each organization's training procedure.

---

**Asbestos related training**

The "competent person" on any asbestos job must have received 40 hours of EPA-approved asbestos training. Workers on any asbestos job must have received 8 hours of specialized asbestos training.

---

**KSL**

As the Support Services Contractor, KSL performs many asbestos jobs at LANL. To help ensure a thorough understanding of the Asbestos NESHAP requirements and their implementation at LANL, MAQ will provide annual orientation or training to the KSL asbestos job foremen on the requirements in this plan.

## Section 3

### Quality Improvement

#### Improving Project Quality

---

**Project performance reports**

Personnel assigned to perform Asbestos Report Task activities will provide periodic verbal or written updates to the Task Leader. These updates will be used by the Task Leader to determine project focus.

The Task Leader will provide periodic verbal or written updates to the Title V Implementation Team Leader and/or Group Leader. These updates will be used to keep group management apprised of the focus of Asbestos Report Task activities and any project shortcomings.

The Asbestos Report Task Leader will prepare performance reports as needed. These performance reports will address items such as:

- Audit/assessment activities relating to quality assurance of Asbestos Report Task activities
  - Problems or deficiencies identified during assessment activities or during routine performance of work
- 

**Performance report distribution**

The following receive copies of project performance reports:

- MAQ Group Leader
  - MAQ Quality Assurance Officer
  - MAQ Title V Implementation Team Leader
  - Asbestos Report Task personnel
- 

**Corrective actions within MAQ**

Corrective actions for all MAQ projects are initiated, tracked, corrected, and documented according to the MAQ Quality Management Plan and group procedure MAQ-026, "Deficiency Tracking and Reporting."

---

**Deficiency trending**

At least once a year, the Asbestos Report Task Leader reviews the deficiency reports to look for trends in the occurrence of deficiencies. The trending analysis results are documented in a memo or report, forwarded to the MAQ Group Leader, and copied to the MAQ records management system.



## **Improving Project Quality, continued**

---

**Quality improvement** Project activities will adhere to the policy for continuous improvement as given in the MAQ QMP.

The MAQ Group Leader, Title V Implementation Team Leader, Asbestos Report Task Leader, and Quality Assurance Officer use performance reports and deficiency trending results to improve project processes.

## Section 4

### Documents and Records

#### Project Documents and Records

---

**Document control** This plan is controlled through the MAQ document control program (MAQ-030, "Document Distribution").

The following individuals will be notified of revisions to this project plan:

- MAQ Group Leader
  - Asbestos Report Task Leader
  - Asbestos Report Task team members
  - MAQ Quality Assurance Officer
  - MAQ Title V Implementation Team Leader
- 

**Project records** The federal regulations require notification of all jobs and maintenance of records that show final disposal (burial). By agreement with the NMED, quarterly reports are required. Therefore, most of the documents received and used by the Asbestos Report Task are not needed to show compliance but are necessary for internal tracking purposes. Asbestos Report Task records maintained by MAQ are in four basic groupings and include:

- Incremental small job notification file as defined by the KSL Asbestos Memo Job issue forms.
  - Large Job and Demolition Job Notifications. These will include the work from Environmental Restoration and outside contractors.
  - Quarterly Report files (to NMED that shows proof of burial)
  - Asbestos Project field inspection forms
- 

**Records disposition and retention** Current records, and the previous years' records, are maintained in the MAQ records system (see MAQ-025) and are available for auditing. After approximately one year, when all jobs are closed out, wastes are accounted for, and no quick reference from them is needed, the records from previous years may be transferred to permanent archival storage. Records are archived in compliance with Laboratory and DOE requirements for records retention, storage, and management.

## Project Documents and Records, continued

---

### List of individual records

The following records may be received as part of the Asbestos Report Task. Not all of these records are received for all jobs.

- Annual forecast notification for total of small jobs (KSL)
- Individual job notices
- Approval letter from state with tracking number
- Chemical Wasted Disposal Request (CWDR) for all small jobs
- Notification from KSL and any subcontractors to NMED for large jobs
- Approval letter from state with tracking number
- CWDRs for some large jobs
- Hazardous waste transfer from FWO (non-rad)
- Off-site asbestos solid waste disposal record from KSL
- On-site asbestos solid waste disposal record from FWO (rad)
- LANL Special Waste Manifest from KSL
- Waste Data Form from FWO
- Waste Manifest from FWO
- Waste manifest for shipment to off-site landfill (non-rad)
- Dumpster or trailer log sheet
- Quarterly report letter to state showing proof of burial for each state tracking number

## Section 5

### Work Processes

#### 5.1 Planning and Performing Work

---

**Purpose of  
Asbestos  
Report Task  
work  
processes**

The Asbestos Report Task performs work to demonstrate compliance with the reporting requirements of 40 CFR 61, Subpart M, as applicable at LANL. The applicable sections of Subpart M include:

40CFR 61.145 – Standard for demolition and renovation

40 CFR 61.150 – Standard for waste disposal for all sources except asbestos mills

40 CFR 61.154 – Standard for active waste disposal sites:

40 CFR Part 61, Subpart M, Appendix A – Interpretive Rule Governing Roof Removal Operations

Further, the Asbestos Report Task performs work to demonstrate compliance with the reporting requirements of:

DOE Order EH-413-062/1195 – Regulatory Requirements Affecting Disposal of Asbestos-Containing Waste

---

**Requirement**

LANL is an applicable source for 40 CFR 61, Subpart M because, 1) demolition activities occur, and 2) asbestos renovation activities occur.

---

**Policy**

The MAQ Asbestos Report Task will help ensure LANL compliance with 40 CFR 61, Subpart M by (1) ensuring that applicable reporting requirements of the regulation are completed in a timely fashion, and (2) periodically performing inspections of asbestos waste storage areas to verify appropriate records.

The MAQ Asbestos Report Task will further support asbestos removal/renovation and demolition activities by providing technical support to operating groups and contractors. This support will only be provided where personnel have sufficient technical expertise.

## **Planning and Performing Work, continued**

---

**Description of work processes** An overview of the work flow is presented in Appendix B (Flow Chart of Asbestos Management Process). The work processes used to meet the regulatory requirements and the requirements of this plan can be divided as follows:

- 5.2 Reporting Activities
- 5.3 Inspection Activities
- 5.4 Technical Support Activities.

## 5.2 Reporting Activities

---

### Purpose

The Reporting activities work process is used to

- Ensure timely and accurate reporting of routine reports as required by 40 CFR 61, Subpart M,
  - Ensure timely and accurate notification of the NMED in the event of planned asbestos removal/renovation and/or demolition activities, and
  - Ensure timely and accurate notification of the NMED in the event that previous notifications or reports require revision.
- 

### Requirement

According to 40 CFR 61.145, the NMED must be notified at least ten working days in advance of:

- Demolition of any structure
- Removal of any amount of regulated asbestos containing material\* in excess of:
  - 260 linear feet on pipes,
  - 160 square feet on other facility components, or
  - 35 cubic feet off facility components where the length or area could not be measured previously.
- Change in start date of an operation for which previous notice was given. A ten-day notification only applies when the start date will be moved up (sooner) than originally reported. If the start date will be pushed back, the ten day requirement does not apply, but notification is still required.

**\*NOTE:** The actual requirement only applies to regulated ACM; however, in response to a violation of the Asbestos NESHAP, LANL will require notification for any ACM above the specified quantity. This corrective action specifically applies to resilient flooring material.

## 5.2 Reporting Activities, continued

---

### Policy

The MAQ Asbestos Report Task will support reporting activities in support of Laboratory operations. This support will come in two forms:

- MAQ will prepare and submit reports/notifications as noted in this plan.
- MAQ will provide technical and regulatory review of reports/notifications submitted to the NMED by Laboratory organizations or their subcontractors.

Unless specified otherwise in this plan, the responsibility for reporting to or notifying the NMED may be MAQ, other Laboratory organizations, or their subcontractors.

---

### Description of sub-processes

This reporting activities work process can be divided into six sub-processes. These six sub-processes are:

- 5.2.1 Annual Forecast Report
- 5.2.2 Large Job Notification
- 5.2.3 Demolition Notification
- 5.2.4 Asbestos Waste Reporting
- 5.2.5 Emergency Notification

## 5.2.1 Annual Forecast Report

---

<b>Purpose</b>	The <b>Annual Forecast</b> is a required report to the NMED that provides a reasonable estimate of the total amount of friable asbestos to be removed during <b>small job</b> and <b>maintenance activity</b> during the following calendar year. This forecast does not address large jobs (see next section). Small job activity consists of incremental jobs that remove <u>less than</u> 260 linear feet of pipe insulation, 160 square feet of other facility components, or 35 cubic feet of facility components where the length or area could not be measured previously.
<b>Requirement</b>	Compliance is required by 40 CFR 61.145(a)(4)(iii) and 61.145(b)(3)(ii). The updated requirement is in 40 CFR 61.145(b)(2).
<b>Report preparation and submittal</b>	During the first part of December each year, the KSL Maintenance Department Asbestos Supervisor (KSL/MDAS) fills out and submits to MAQ the <b>New Mexico Environment Department Asbestos Demolition/Renovation Notification form</b> . The Asbestos Report Task then prepares a cover letter and submits it with this notification form to the Air Quality Bureau of the NMED at least 10 working days before the first work day of the following year.
<b>Report content</b>	This notification contains an estimate of linear feet of pipe insulation and square footage of on-facility insulation that is reasonably expected to be removed in the following calendar year during normal day-to-day work activity. It should be noted that the square footage given here is not for floor, wall, or roof areas of non-friable materials (vinyl asbestos floor tiles, roofing felts and mastics, and transite). This square footage consists of thermal systems insulation (TSI), such as sprayed-on or block type insulation, found on the surface areas of large facility equipment such as boilers and HVAC units.
<b>NMED response</b>	The NMED will respond with an acknowledgment of receipt of the forecast. The NMED will also assign a tracking number to be used in tracking all small job asbestos work activity and subsequent asbestos waste disposal.
<b>Notification to MAQ</b>	KSL outlines and describes each job in a memo to the Asbestos Report Task called a <b>Notice of Intention of Friable/Nonfriable Asbestos Removal</b> . The Asbestos Reporting Project files these memos in the project incremental small job notification file and enters the information into the Asbestos NESHAP Tracking Database.



## 5.2.1 Annual Forecast Report, continued

---

**Revised notification**

If the aggregate projected total of linear or square feet to be removed, as monitored throughout the year, indicates that the annual forecast will be in error by more than 20%, an updated estimate must be submitted to the NMED by the Asbestos Report Task Leader. This may be accomplished by a phone call to NMED about the updated estimate change followed by a fax of the revised copy of notification with updated amount of asbestos to be removed.

---

**Non-friable asbestos**

Note that even though the annual notification forecasts only the removal of friable asbestos, the LANL Asbestos Management Program Plan controls and monitors non-friable asbestos removals as well. Materials containing non-friable asbestos are not regulated as asbestos containing materials (RACM) under the NESHAP. As a good business practice, with the exception of formal notifications, non-friable asbestos containing materials are removed, handled, and disposed of in the same manner as RACM. A separate category and total is maintained in the Asbestos NESHAP Tracking Database for non-friable waste material.

## 5.2.2 Large Job Notification

---

<b>Purpose</b>	When a job requires the removal of <u>more than</u> 260 linear feet of pipe insulation, 160 square feet of other facility components, or an estimated off-facility amount of more than 35 cubic feet, a special Large Job Notification must be issued to NMED.
<b>Requirement</b>	Compliance is required by 40 CFR 61.145 (a)(4)(i, ii).
<b>Notification</b>	Notification consists of the <b>NMED Asbestos Demolition/Renovation Notification Form</b> . This must be delivered to the NMED or postmarked at least 10 working days before the scheduled start date stated in the notification. The NMED will respond to this notice and assign a job and waste tracking number similar to the one issued for the annual estimate. If work cannot begin on that date, the NMED must be notified of the delay and the new scheduled start date. This delay notice may be an initial phone call, but must be followed with a revised written notification. No work that will disturb asbestos may be performed on the project before the scheduled start date. Exception: in the event of emergency removal needs, see Section 5.2.5 Emergency Notification.
<b>Tracking asbestos removed</b>	The wastes from this type of job are not totaled against the annual estimate for small jobs. They are accumulated, stored, and disposed of in the same manner, but are totaled separately in each quarterly report.

## 5.2.3 Demolition Notification

---

<b>Purpose</b>	If a building or facility is scheduled for demolition, <b>whether asbestos is known to be present <u>or not</u></b> , a Special Notification must be issued to NMED.
<b>Requirement</b>	Compliance is required by 40 CFR 61.145(a)(2)(ii).
<b>Notification</b>	This notification is the same as the one used for large jobs. See Section 5.2.2.
<b>Subsequent discovery of asbestos</b>	Normally, there will be no asbestos wastes from demolition activity unless asbestos went undetected during facility inspection, and was later found during demolition. If asbestos is discovered during demolition, work must stop, the amount of asbestos must be calculated, information put into the tracking database, and notification to NMED revised if necessary.

## 5.2.4 Asbestos Waste Reporting

---

<b>Purpose</b>	Quarterly waste reporting was agreed to between the NMED and Group HSE-8 on June 23, 1991 (HSE-8:91-1109, and a July 9, 1991 certified letter from Monet Harrison, Acting Chief, ES&H Branch of DOE/LAAO to Debby Brinkerhoff of the NMED Air Quality Bureau). These reports provide notification of all asbestos activity and consequent waste material disposal.
<b>Requirement</b>	Compliance is required by 40 CFR 61.150(e).
<b>Tracking movement of waste</b>	In order to generate the quarterly report, MAQ tracks all asbestos renovation/removal activity performed during the year by KSL, and other contractors, including annual small job work and large renovation/demolition work. Asbestos is tracked from the generation site, to the temporary storage containers, the TA-60-85 MRF-A Yard Transfer Station, and on to final off-site disposal landfills. In the case of potentially radioactive wastes, instead of going to TA-60-85 MRF-A Yard, the waste goes directly to TA-54, Area G for permanent disposal. This tracking is accomplished using the NESHAP Asbestos Tracking Database.
<b>Transport of waste</b>	When a trailer (or roll-off) is full, the trailer is locked out and KSL completes a Chemical Waste Disposal Request (CWDR; for non-rad containing materials) and a Hazardous Material Transfer form to request transport to the holding area at TA-60-85 MRF-A Yard site. At the holding area, the bags are moved from the trailers into the vehicle for off-site transport to the disposal facility.
<b>Information from the database</b>	MAQ team personnel enter information into the NESHAP Asbestos Tracking Database to track all asbestos renovation/removal activity performed during the year by KSL and other contractors. Information concerning all jobs and waste in the database is used to assist in tracking each job and to generate the quarterly report to the NMED.

## 5.2.4 Asbestos Waste Reporting, continued

---

**Preparing quarterly report**

At the end of each calendar quarter, the MAQ Asbestos Report Task assembles all of the waste disposal papers, associates each job to the final waste disposal record, and writes the quarterly report to the NMED to show that all removal jobs were properly disposed. Most records are not required for documentation purposes but are used for internal tracking purposes to ensure that removed volumes equal shipped volumes. The quarterly report consists of a cover letter and the summary report generated by the database, which lists the disposal manifests associated with each tracking number.

There are times when Solid Waste Operations has made no off-site shipments and no complete disposal has been accomplished. At these times, the report shows only work that has been completed with the associated waste being held for disposal at either area TA-60-85 MRF-A Yard or in the perimeter dumpsters. There may or may not have been any disposals at Area G (for rad-containing waste).

---

**Due date for report**

The report is due as soon as possible after the end of each quarter.

## 5.2.5 Emergency Notification

---

<b>Purpose</b>	In the event of unexpected or emergency instances involving asbestos, the asbestos may be removed immediately without waiting the required 10 days. The Asbestos Report Task will notify the NMED when this occurs and explain the situation.
<b>Requirement</b>	Compliance is required by 40 CFR 61.145(a)(4)(iv) and 40 CFR 61.145(b)(4)(xv).
<b>What is an emergency</b>	In order to qualify as an emergency under Subpart M, the event must pass two tests: <ul style="list-style-type: none"><li>• it must be sudden and unexpected.</li><li>• failure to fix it must result in an unsafe condition, damage to equipment, or an unreasonable financial burden.</li></ul>
<b>Notification</b>	In the event of an emergency situation involving asbestos that won't allow LANL to wait the 10 days to perform the asbestos job, the Asbestos Report Task notifies the NMED by telephone. The verbal notification will be followed with a special form or letter to explain the emergency in detail; how the condition or event caused an unsafe condition or how the event would damage equipment or be an unreasonable financial burden; and outline the proposed plan of corrective action or repair.

## 5.3 Inspection Activities

---

**Purpose** The inspection activities work process is used to

- Ensure that sufficient records are maintained to demonstrate compliance with the reporting and notification requirements described in Section 5.2.
- Review work practices at asbestos disposal sites to help ensure that appropriate practices, as described in 40 CFR 61, Subpart M, are performed.
- Track future operations to ensure continued compliance with reporting requirements.

---

**Requirement** 40 CFR 61, Subpart M provides requirements for physical controls and/or posting and labeling for each of the following activities:

- Asbestos removal (61.145 Standard for Demolition and Renovation)
- Asbestos disposal and packaging (61.150 Standard for Waste Disposal ... for Demolition and Renovation...)

---

**Policy** The MAQ Asbestos Report Task will perform inspection activities to help ensure that applicable laws and regulations are followed when working with asbestos.

---

**Description of sub-processes** This reporting activities work process can be divided into three sub-processes that demonstrate how the purpose of the inspection activities work process is achieved. These three sub-processes are:

- 5.3.1 Dumpster and trailer inspections
- 5.3.2 Landfill inspections
- 5.3.3 New job tracking

## 5.3.1 Dumpster and Trailer Inspections

---

**Purpose** Asbestos Report Task personnel perform at least weekly inspections of the asbestos waste storage dumpsters and trailers in order to stay current with activity in progress. This information, when combined with the finished work notices, is used to keep the asbestos database up to date.

---

**Inspection activities** During the course of these weekly inspections, Asbestos Report Task personnel will perform the following checks:

- Verify contents of dumpsters and trailers to ensure only asbestos waste is disposed.
- Verify proper disposal and packaging practices are employed for asbestos wastes.
- Verify complete records (e.g., log sheets) are maintained for each dumpster and trailer.
- Record any new asbestos wastes on the MAQ asbestos inspection report form.

---

**Follow up** In the event of any discrepancies identified during the course of these inspections, the MAQ Asbestos Report Task Leader will follow up with appropriate personnel and organizations to ensure proper waste disposal practices are employed.

Depending on the significance of the problem, the Asbestos Report Task Leader will determine whether a violation of a requirement occurred that requires initiation of an MAQ deficiency report according to MAQ-026.



## 5.3.2 Landfill Inspections

---

**Purpose** The Laboratory is responsible for its asbestos waste even after it has been disposed at an approved disposal facility. To ensure that practices at the disposal facility continue to meet appropriate standards, periodic assessments of the facility will be used.

---

**Approach** In addition to MAQ needs, other LANL organizations also require auditing of these landfills or disposal facilities. Landfill auditing is required by DOE/LANL to ensure proper disposal of hazardous wastes generated at LANL.

The DOE requires that every 18 to 24 months, any Transfer, Storage, Disposal Facility (TSDF) that accepts hazardous waste materials from LANL, such as asbestos, must be audited to ensure compliance with relevant environmental regulations. FWO-SWO schedules and coordinates these audits and their personnel serve as the team leaders.

The Asbestos project relies on these inspections/audits to meet its needs. Periodically, MAQ may send a representative that is trained to the Asbestos NESHAP regulations along on the assessments.

### 5.3.3 Tracking New Jobs

---

**Purpose** New jobs are identified through the MAQ Air Quality Review process (including ESH-IDs). Time lag between the original AQR and the start of the job can be significant (e.g., more than six months). If the job requires notification, MAQ contacts the facility contact to remind them of requirements for notification before work starts.

---

**Initial AQR** MAQ conducts air quality reviews on a near daily basis. In the event that asbestos or demolition is identified as a concern, the Asbestos Report Task Leader is notified. Follow-up on all ESH-IDs is generally not possible due to resource constraints.

---

**Tracking** Asbestos project personnel will put each potential new job into a tracking system to ensure that contact with the contractor or owning group is made at least monthly.

## 5.4 Technical Support Activities

---

**Purpose** The technical support activities work process is used to provide technical support to Laboratory groups and to their sub-contractors during the performance of work governed by 40 CFR 61, Subpart M.

These activities will be performed as necessary, but they will not take precedence over reporting or inspection activities.

---

**Requirement** None.

---

**Policy** The MAQ Asbestos Report Task will provide technical support to operating groups and to their subcontractors as needed and within appropriate areas of expertise. This support will generally NOT be used to meet the Subpart M requirement that each job have a competent individual on-site.

---

**LANL Asbestos Waste Generator** The Asbestos Report Task Leader interacts with the Asbestos Management Program Working Group and acts as the primary asbestos waste generator for the Laboratory.

The Asbestos Management Program Working Group consists of members from HSR-5, MAQ, FWO-SWO, and KSL. This group is led by HSR-5 and meets periodically (approximately monthly) to discuss on-going asbestos-related plans and problems.

## ***Section 6***

### **Design**

#### **Project Design Activity**

---

**Project design activity** The Asbestos Report Task requires no hardware design activity.

## ***Section 7***

### **Procurement**

#### **Project Procurement**

---

**Procured items** The Asbestos Report Task procures needed supplies in accordance with the Laboratory process for procurement and the requirements in the MAQ-QMP.

## ***Section 8***

### **Inspection and Acceptance Testing**

#### **Project Supplies Inspection and Acceptance**

---

**Inspection and acceptance of project supplies** Asbestos Report Task supplies are commercial grade in nature and require no special acceptance practices or procedures.

## ***Section 9***

### **Management Assessment**

#### **Internal Management Assessments**

---

**Internal assessments**

The Meteorology and Air Quality Group conducts internal management assessments of all projects and programs in the group in accordance with requirements in the MAQ Quality Management Plan. Assessments of the project are documented and filed as records.

---

**Responding to assessments**

When violations of requirements are found during a management assessment, a deficiency report is initiated to document the violation. Corrective actions are tracked and documented in accordance with MAQ-026, "Deficiency Reporting and Correcting."

## ***Section 10***

### **Independent Assessment**

#### **NMED Independent External Assessments**

---

**External assessments**

The NMED conducts unannounced assessments and inspections of all asbestos matters and activities at the Laboratory. Assessors interface with the Laboratory through the MAQ Asbestos Report Task Leader for on-site escort. Assessments may include examination of the records held by the Asbestos Report Task and/or field inspections of asbestos remediation job sites.

Advance notice of assessments or inspections is provided only when NMED access to cleared areas is required.

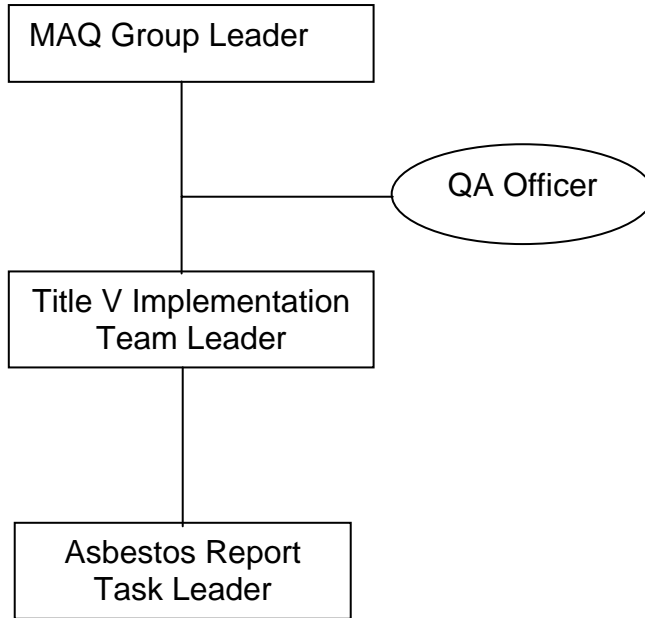
These assessments are independent of other regulatory visits by NMED Solid Waste Inspectors that are handled by RRES-SWRC.

[Click here to record "self-study" training to this procedure.](#)



## Appendix A

### Project Organization

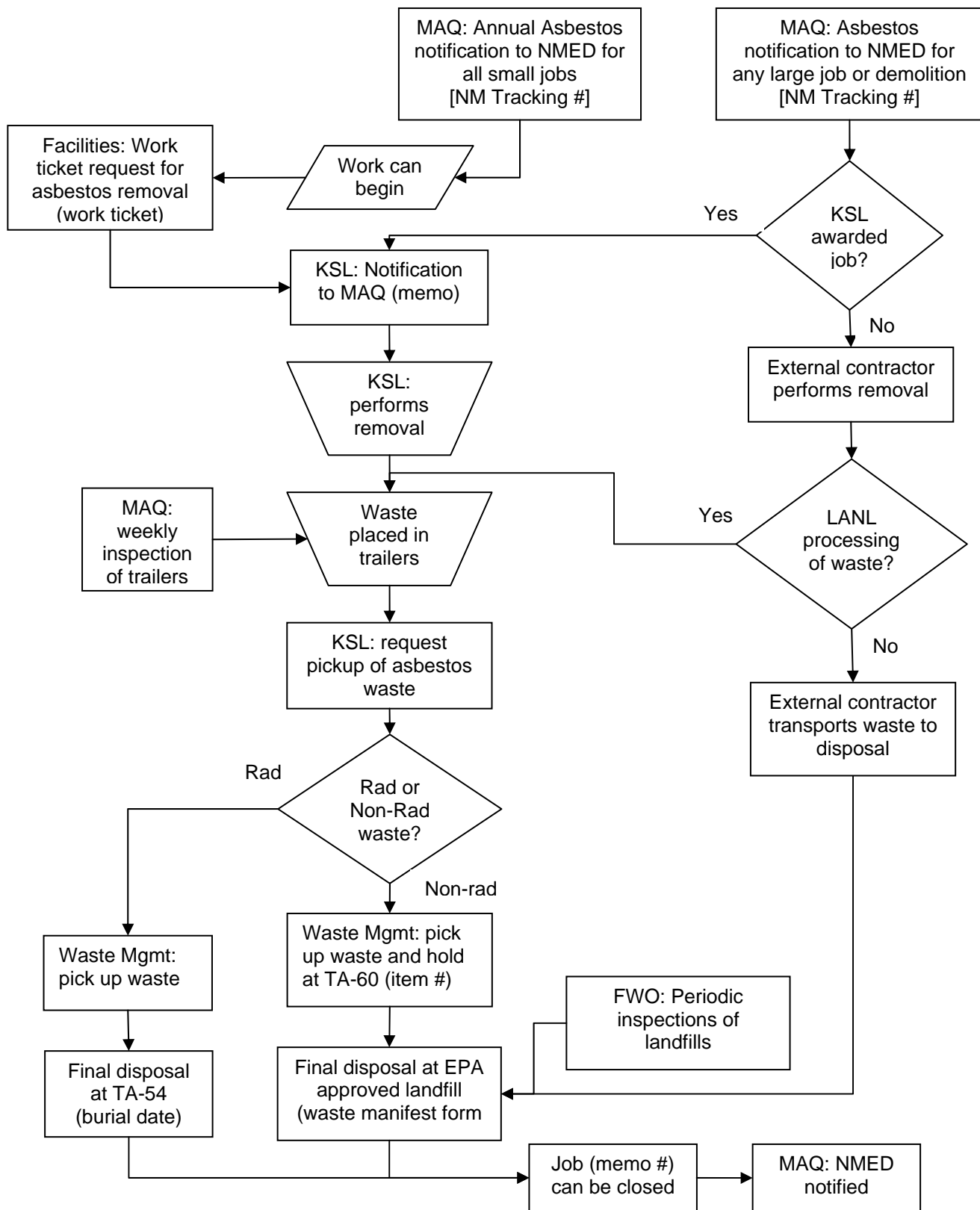






## Appendix B

### Flowchart of Asbestos Management Process





## ***Appendix C***

### **References**

#### Requirements and guidance documents:

DOE Order 414.1A, "Quality Assurance," issued November 24, 1998 (supersedes DOE Order 5700.6C, "Quality Assurance")

LIR402-570-01, "Asbestos," Los Alamos National Laboratory, February 8, 2001

Laboratory's Asbestos Management Program Plan (AMP), HSR-5

Letter HSE-8:91-1109, "Report on Asbestos Waste Disposal Activities", Daniel Macdonell, Environmental Protection Group, to Steve Fong, DOE, through Craig Eberhart, June 27, 1991

Letter from Monet Harrison, Acting Chief, ES&H Branch of DOE/LAAO to Debby Brinkerhoff of the NMED Air Quality Bureau, July 9, 1991

#### Group MAQ documents:

MAQ-QMP, "Quality Management Plan for the Meteorology and Air Quality Group"

MAQ-022, "Preparation, Review, and Approval of Procedures"

MAQ-024, "Personnel Training"

MAQ-025, "Records Management"

MAQ-026, "Deficiency Reporting and Correcting"

MAQ-029, "Management Assessments"

MAQ-030, "Document Distribution"

MAQ-032, "Orienting New Employees"