ENVIRONMENTAL MANAGEMENT WASTE MANAGEMENT FACILITY
Physical Waste Acceptance Criterion Blanket Variance Approval

Blanket Variance No: EMWMF-BV-08-01
Revision No: 3
Effective Date: 03/25/2014

Approval Signature

Blanket Variance Applicable to: Non-friable asbestos-containing transite panels only.

1. Physical Waste Acceptance Criterion No.: 8

   Requirement: Asbestos-containing materials (ACM) shall be wetted, double-bagged and shipped separately or with adequate volumes of soil to facilitate safe transportation and burial. Bags shall be limited to a maximum weight of 40 lbs.

   Basis: General handling/disposal practices associated with building decontamination and demolition work to address asbestos abatement that includes transite panels.

   Note: Because this blanket variance does not apply to beryllium dust containing waste as stated in the physical waste acceptance criterion no. 8, reference to beryllium has been removed from the requirement above.

2. Variance:

   Alternate packaging for intact (not broken or crumbled) Category II non-friable ACM transite panels in good condition that is in various sizes to: (1) eliminate need for size reduction and placing ACM in double 40-lb bags and (2) change method of shipment to flatbed trailers, shipped without soil.

   Justification: Disposal of whole or partial transite panels is generally more protective of worker health than requiring transite to be cut or broken. Disposal of securely packaged transite panels can also be accomplished with a minimum risk of release if the conditions in Section 3 are followed.

3. Conditions of Variance:

   a. This variance is only for intact or essentially intact transite panels that are in good condition.

   b. Transite panels shall be shipped separately from other waste types and without soil.

   c. Transite panels that are 4-feet wide and up to 12-feet long shall be stacked as follows:
      1. All panels to be stacked shall be of similar length.
      2. Panels shall be stacked in a stable configuration that minimizes void space between panels.

3. Only like panels shall be stacked together (e.g., corrugated with corrugated and flat with flat).
4. Panel stacks shall have a uniform shape and be limited to maximum dimensions of 2-feet high by 4-feet wide by 12-feet long.
5. Panel stacks shall not exceed 24,000 lbs.
6. Panel stacks shall be banded sufficiently to prevent shifting during transportation and unloading. **[Note: Stacks of 12-foot long transite panels shall include bands approximately 1 to 2 feet from each end to help reduce breakage during offloading]**.
7. Stacked and banded transite panels shall be wrapped in at least a single layer of plastic sheeting with a minimum thickness of 6-mil with all flaps folded over and sealed with tape or equivalent, in accordance with 29 CFR 1926.1101(l)(2).

d. Transite panels with dimensions that are ≤ 4-feet wide by 4-feet long shall be stacked as follows:
   1. Panels shall be stacked in a stable configuration that minimizes void space between panels.
   2. Only like panels shall be stacked together (e.g., corrugated with corrugated and flat with flat).
   3. Panel stacks shall be limited to a maximum height of 2-feet.
   4. Panel stacks shall not exceed 24,000 lbs.
   5. Panel stacks shall be wrapped in at least a single layer of plastic with a minimum thickness of 6-mil with all flaps folded over and sealed with tape or equivalent, in accordance with 29 CFR 1926.1101(l)(2).
   6. Panel stacks shall be banded to a pallet to prevent shifting during transportation and unloading.

e. Smaller length or broken transite panels (i.e., pieces) that are not conducive to orderly stacking shall be packaged as follow:
   1. Transite panel pieces shall be placed into double-lined supersacks or sealed bladder bags.
   2. Supersacks or bladder bag packages shall be capable of being placed in a nominal 18-inch lift and being sufficiently compacted following placement.

f. The transite packages shall be labeled in accordance with 29 CFR 1926.1101(k)(8).

g. Shipping papers shall include the term "asbestos."

h. Transite panels shall be shipped as follows:
   1. Stacked and banded transite panels greater than 4-feet in length shall be shipped via flatbed truck using bed-mounted dunnage (minimum 4 inch by 4 inch). **[Note: packaging material beneath the stacks shall not obstruct forks during offloading]**.
   2. Stacked transite panels ≤ 4-feet in length that are strapped to a pallet shall be shipped via flatbed truck **[Note: packaging material beneath the stacks shall not obstruct forks during offloading]**.
   3. Supersack or bladder bag packages shall be shipped (1) in intermodal containers or (2) via flatbed truck with package banded to a pallet. **[Note: packaging material beneath the stacks shall not obstruct forks during offloading.]**

4. Application of Blanket Variance:

   a. Certification of full compliance with the conditions of this blanket variance, as stated herein, by the waste generator of a specific and approved waste lot fulfills the requirements of a variance to the physical waste acceptance criterion in accordance with *Attainment Plan for Risk/Toxicity-Based Waste Acceptance Criteria at the Oak Ridge Reservation, Oak Ridge, Tennessee* (DOE/OR/01-1909&D3).

   b. Generator shall reference Blanket Variance EMWMF-BV-08-01, Revision 3 in required sections of the Waste Profile.

5. Revocation of Blanket Variance:

   Upon discovery of waste from a specific waste lot that is not in full compliance with the conditions stated herein, the application of this blanket variance may be revoked by written communications to the waste generator's responsible contact and the waste declared to be anomalous waste.