

# ENVIRONMENTAL MANAGEMENT WASTE MANAGEMENT FACILITY

## Physical Waste Acceptance Criterion Blanket Variance Approval

**Blanket Variance No:** EMWMF-BV-08-02

**Revision No:** 2

**Effective Date:** 10/05/09

  
Approval Signature

**Blanket Variance Applicable to:** Friable and non-friable asbestos-containing (ACM) including, but not limited to, the following items containing asbestos: insulation, floor tiles, baseboards, roofing materials, miscellaneous building debris, asbestos wrapped pipe ( $\leq 2$  in. diameter); asbestos-core fire doors, and conduit containing asbestos insulated wire.

Note: Does not apply to transite, instead refer to EMWMF-BV-08-01.

### 1. Physical Waste Acceptance Criterion No.: 8

**Requirement:** Asbestos-containing materials 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 asbestos abatement work.

Note: No distinction made between friable and non-friable ACM.

Note 1: Because this blanket variance does not apply to beryllium dust containing waste as stated in the physical waste acceptance criterion, reference has been removed from the requirement above.

Note 2: This variance is not applicable to items that cause the package to be larger than 24-inches in height (e.g., tanks, structural members), , and items containing proportionally large voids (e.g., fire safe or filing cabinet, boiler, furnace, dryer, autoclave). Items such as these will require individual PWAC variances.

### 2. Variance:

Alternate packaging for friable and non-friable ACM and asbestos items in lined supersacks, sealed bladder bags, wrapped in double layer of plastic exceeding 40 lbs. or placed in double 6-mil ACM bags exceeding 40-lbs per bag and shipped separately in intermodal containers without soil to facilitate direct dumping or on flatbed trucks for offloading.

Justification: Use of the alternate method for packaging and disposal of ACM as provided in this variance is more protective of disposal workers health as it reduces the potential for ripped ACM containing bags and it eliminates direct handling of bags.

3. Conditions of Variance:

- a. Soft asbestos insulation with or without occasional hard asbestos contaminated items (e.g., wood, metal, or plastic), hard asbestos containing items (floor tiles, baseboards, roofing materials, miscellaneous building debris), or other ACM:
  1. Shall be wetted and packaged in double-lined supersacks or sealed bladder bags;
  2. Shall not have sharp points or jagged edges (e.g., no protruding nails, wire or metal) that may puncture or rip the supersack or bladder bag;
  3. Supersacks and bladder bags shall be capable of being placed in a nominal 24 inch lift and being sufficiently compacted following placement;
  4. Supersacks or bladder bags containing ACM shall be properly labeled in accordance with applicable regulatory requirements;
  5. Supersacks and bladder bags shall be shipped in roll-off containers or intermodal containers with other similar packages and without soil or strapped to pallets and shipped on flatbed trailers; or
  6. Shall be wetted and packaged in double 6-mil ACM bags and shipped in intermodals without soil for bulk disposal.
  
- b. Asbestos insulated pipe:
  1. Shall be less than 2 inches interior diameter and less than or equal to 8 ft. in length;
  2. Shall be wetted and packaged and shipped as follows:
    - For intermodal containers: Individual pipes or bundles of 10 or less pipes strapped firmly together shall be wrapped with double layer of 6-mil plastic and shipped in lined intermodal containers for bulk placement unless a liner variance has been approved.
    - Multiple pipes shall be banded together, wrapped with double layer of 6-mil plastic or packaged in supersacks and strapped to pallets and transported via flatbed truck for offloading.
  3. Packages shall be capable of being placed in a nominal 18 inch lift and being sufficiently compacted following placement.
  
- c. Conduit containing asbestos insulated wire:
  1. Shall be cut in lengths not to exceed 8 feet;
  2. Shall have ends of conduit double wrapped with 6-mil plastic or have ends sealed with caulk and wrapped with one layer of 6-mil plastic;
  3. Shall be banded securely together, strapped to pallets and transported via flatbed truck for offloading;
  4. Packages shall be capable of being placed in a nominal 18 inch lift and being sufficiently compacted following placement
  5. Miscellaneous pieces of conduit shall conform to 3.a above.
  
- d. Packaged ACM items shall meet the void space WAC requirements.
  
- e. Appropriate labels for ACM shall be visible on all containers and packages and shipping papers accompanying an ACM load shall have the term "asbestos" listed in accordance with applicable regulatory requirements.

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, 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 to reference Blanket Variance EMWMF-BV-08-02 in required sections of the Waste Profile and attach a hard copy when submitting the waste profile to the Waste Acceptance Criteria (WAC) Attainment Team.
- c. Generator to attach a hard copy of this blanket variance to Section 11 of the Readiness to Ship Checklist.

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, this blanket variance may be revoked by written communications to the generator's BJC responsible contact and the waste declared to be anomalous waste.