



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**NATIONAL RISK MANAGEMENT RESEARCH LABORATORY**  
**CINCINNATI, OHIO 45268**

October 24, 2007

Dana E. Brown  
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Dear Mr. Brown,

Thank you for the email that you sent on October 12, 2007 to Tom Simons and Robert Courtnage in the Office of Pollution Prevention and Toxic Substances (OPPTS). Your email, which was directed to OPPTS, inquired about EPA's work to evaluate the value of an updated process to control asbestos during the demolition of buildings that contain asbestos materials (called the Alternative Asbestos Control Method (AACM)). John Smith, a member of the OPPTS staff, is a valued team member on the AACM study. We have reviewed the issues you raised with all concerned offices, including the Office of Air and Radiation, the Office of Enforcement and Compliance Assurance, and EPA Region 6, and we are pleased to provide you with this response. While a supporter of the research, OPPTS forwarded the email to us for response and any future correspondence, since we are the leads on the study and can better address any factual issues.

You are correct that we are currently working to conduct the third in a series of field tests of this potential alternative method and to collect scientific information for review. Our two previous tests of this updated process are under review, and we are continuing our work to obtain more information and improve upon these earlier tests.

The objective of our third test is to evaluate the method on additional forms of asbestos-containing materials, specifically 'popcorn' ceiling materials commonly used during earlier building construction in the United States. You have correctly noted that we have been contacting a variety of people and organizations to help us identify candidate buildings to continue our evaluation, including the City of Dallas. The Peer Review committee was also solicited for any potential buildings that would qualify for future demolitions, as noted by Office of Research and Development (ORD).

All of our tests have utilized abandoned and unoccupied buildings. Please be assured none of our tests are designed to address asbestos exposure in occupied structures and we are not proposing to conduct any test on occupied structures. Rather our work has been focused on addressing the inventory of asbestos-containing buildings that are rapidly deteriorating in communities and await demolition.

Our goal is to scientifically determine if this updated process can better serve the public. We seek to provide protection from asbestos fibers that matches or exceeds that of current methods, and at the same time offers an option that can help in the more rapid removal of buildings that present safety, crime, and health risks to communities. We obviously have learned from each test that we have

conducted and we attempt to incorporate those lessons in future evaluations. The external peer review of the first test has helped us identify additional areas of focus for future activities and we are continuing to work with the review team.

As you have noted, the Final Peer Review Report has not yet been completed by ORD addressing the comments from the Peer Reviewers. The Agency is anticipating that the report will be addressed by the end of this calendar year. If you have any further questions regarding the Peer Review activities or technical aspects of the project, please contact Roger Wilmoth who is the lead technical contact at ORD, Cincinnati, Ohio at 513-569-7509, who would be happy to attempt to explain any aspects of this technology that are troublesome to you.

We are continuing our work on the scientific evaluation of a method that may move forward the difficult challenge of rethinking the way asbestos containing buildings are being demolished across the country. Our general belief is that if there is an improved process that can offer a more effective and faster solution to communities, we should continue our work. If the method proves successful, our hope is that more abandoned buildings can be demolished in a shorter period of time. We are driven by our commitment to help communities and to protect public health and the environment.

Your discussion pertaining to the legal conditions providing the authority to conduct the first two studies was unfortunately misinformed. A "No Action Assurance (NAA) Letter" was issued for Demolition #1 for that activity only. The second demolition activity did not require a NAA letter because the local authorities issued a letter deeming the second building to be "Structurally Unsound and in Imminent Danger of Collapse". As you well know, no NAA letter was necessary from the Office of Enforcement and Compliance Assurance (OECA), because this second demolition could be completed in compliance with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos. Both letters have been on the EPA web site for some time. Representatives from the Arkansas Department of the Environmental Quality and EPA Region 6 office were present along with the project team from ORD. Ron Rutherford from OECA was present for the first demolition performed. The demolition followed the Quality Assurance Project Plan (QAPP) for the AACM project, which can also be found on the Region 6 website, <http://epa.gov/region6/6xa/asbestos.htm>.

We feel it is important to continue our work to provide new scientific information to decision makers within EPA as well as outside the Agency. Results to date indicate that the AACM could be equally or more protective than the Asbestos NESHAP and may provide better worker protection. Our effort to examine the AACM for demolishing asbestos-containing buildings has generated great interest. We want to make clear that this in no way an attempt to rollback or reduce the protection offered by the current rules. Our goal is to scientifically evaluate a potential additional tool that may be as or more effective thereby helping the American public. We welcome comments on the field tests and are committed to follow the science in deciding whether and how to move forward. We are encouraged by the results to date.

You also raised the issue of any funding utilized for the AACM demolitions. The funding is a matter of public record; the first demolition cost about \$1.2 million as it involved the extensive monitoring as documented in the draft report. This monitoring program was developed by a team of agency and industry asbestos experts, as acknowledged by one of the peer reviewers of the QAPP who stated that the team involved the ... "who's who of asbestos research." Lessons learned during the first test

reduced the cost of the second test to around \$400K. The AACM project allows us to learn about a potential improvement to the effectiveness of an existing technology. The AACM can definitely reduce the time and possibly may reduce the cost to demolish dangerous buildings. These goals are in the interest of the American public. The Agency decision to fund the evaluation is rooted in the belief that it has promise to help revitalize communities more rapidly and in a manner as effective as the existing method.

Thank you for your comments and we sincerely appreciate your interest in this project.

Regards

/s/ Roger Wilmoth

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