UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 3 2005

OFFICE OF
RESEARCH AND DEVELOPMENT

MEMORANDUM

SUBJECT: Request for Technical Input- Alternative Asbestos Control Method; National Emissions Standard for Hazardous Air Pollutant, Asbestos Demolition and Renovation Standard, 40 C.F.R. Part 61, Subpart M

FROM: William H. Farland, Ph.D.
Acting Deputy Assistant Administrator for Science
Office of Research and Development

TO: Timothy Oppelt, Acting Assistant Administrator, ORD
Thomas P. Dunne, Acting Assistant Administrator, OSWER
Thomas V. Skinner, Acting Assistant Administrator, OECA
Jeffrey R. Holmstead, Assistant Administrator, OAR
Nikki L. Tinsley, Inspector General
Ann R. Klee, General Counsel
Stephanie Daigle, Acting Associate Administrator, OPEI
Susan Hazen, Principal Deputy Assistant Administrator, OPPTS
Kathleen Callahan, Acting Regional Administrator, Region II
Richard E. Greene, Regional Administrator, Region VI
James B. Gulliford, Regional Administrator, Region VII
Robert E. Roberts, Regional Administrator, Region VIII

The purpose of this memorandum is to request your office's participation to develop, advise and evaluate an Alternative Asbestos Control Method for buildings containing asbestos building materials. A demonstration of the existing National Emissions Standard for Hazardous Air Pollutant (NESHAP) method for Asbestos Demolition and Renovation would be conducted at the same time under nearly identical side-by-side conditions. Demonstrations of the two asbestos demolition methods will help EPA collect comparative scientific data to determine how best to reduce health and safety risks associated with asbestos removal.

A technical team of EPA scientists and engineers is being assembled to develop the demonstration protocol based on Agency experience dealing with asbestos monitoring and abatement. We are asking for your support in providing a member of your staff to the Quality Assurance Project Plan (QAPP) technical development team. Your office's participation will help to ensure that we consider every practical possibility in the planning, execution and evaluation of this research effort.

The roster of the proposed QAPP technical development team is attached for your consideration. Your office's participation is important to ensure a comprehensive evaluation. Additionally, your personal oversight of the project and financial support for necessary travel is critical. Roger Wilmoth of my staff and Mark Hansen of EPA Region 6 Dallas are managing the effort. The QAPP will be externally peer reviewed under the Agency's Peer Review Policy and the process will be facilitated through the EPA's Office of Research and Development - Office of Science Policy. Representatives from several offices within our Agency will evaluate the air monitoring data in the post-demolition report. The independent Science Advisory Board will be involved in evaluating demonstration results. Public involvement will be solicited at various stages throughout the project, and will be an integral part of the project plan.

An Agency team has worked to identify a suitable location for evaluating the two asbestos removal methods associated with demolition. An appropriate site has been identified at the Fort Chaffee Redevelopment Authority in Fort Smith, Arkansas. The site is in a remote and secure location, and has several identical structures containing asbestos building materials to facilitate a side-by-side comparison.

EPA continues to emphasize development of technologies for the improvement of environmental compliance. Demonstration of the Alternative Asbestos Control Method will help us evaluate existing demolition practices of the Asbestos NESHAP with the potential of improving environmental compliance if the Alternative Method is found to be equivalent or superior to existing regulations.

Please advise me, with a copy to Roger Wilmoth and Mark Hansen by August 12, 2005, of your commitment of participation, your confirmation of the attached staff roster or the selection of other staff to be involved. I appreciate your help in moving this project forward.

Attachment

Attachment

Proposed Alternative Asbestos Control Method Research Team

Research Managers
Roger Wilmoth -ORD and Mark Hansen -- Region 6

Contract Work Assignment Manager - -Glenn Shaul - -ORD
QA Officer - -Lauren Drees - -ORD
OnSite EPA Enforcement Officer - David Eppler - -Region 6

QAPP Technical Development Team

Roger Wilmoth - ORD
Glenn Shaul - ORD
Lauren Drees - ORD
Mark Maddaloni - Region 2
Mark Hansen - Region 6
Aubrey Miller - Region 8
Mary Goldade - Region 8
Keith Barnett - OAQPS
Ron Rutherford - OECA
John Smith - OPPTS
Lee Hofmann - OSWER
Brad Venner - NEIC

Resources/Observers

Region 6-	Elvia Evering
Region 7-	Becky Dolph
Region 7-	Lynn Slugantz
OGC-	Chris Kaczmarek
OIG -	Steve Schanamann
OPEI -	Charlotte Bertrand