



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

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OFFICE OF
RESEARCH AND DEVELOPMENT

David Egilman, MD MPH
Clinical Professor of Family Medicine
Alpert School of Medicine Brown University
President GHETS
8 North Main Street
Attleboro, Massachusetts 02703

Dear Dr. Egilman:

This letter is in response to your Request for Correction (RFCⁱ), received by the U.S. Environmental Protection Agency on May 19, 2021, which was assigned [RFC # 21003](#) for tracking purposes. In the RFC email, you requested that the definition of asbestos in EPA/600/R-93/116, [Method for the Determination of Asbestos in Bulk Building Materials](#), be revised to change the aspect ratio from >20:1 to >3:1.ⁱⁱ

This request conflates methods developed for different purposes. The EPA method you cited is intended for observing and measuring asbestos in bulk building materials. In contrast, the aspect ratio of 3:1 or higher cited in your request relates to asbestos fibers in air. Methods for observing and measuring fibers in bulk materials differ substantially from those used to observe and measure low concentrations of fibers in the air. The EPA Bulk Building Materials Method provides (p.19) a tabulation of mineral morphology aspect ratios with a focus on ratio 10:1, and a definition of asbestiform morphology (p.A1) noting mean aspect ratios of 20:1 to 100:1 or higher. EPA does not plan to revise the definition of asbestos in EPA/600/R-93/116 because, as noted, the method therein is intended for analysis of bulk building materials.

Your Right to Appeal

If you are dissatisfied with this response, you may submit a Request for Reconsideration (RFR). EPA requests that any such RFR be submitted within 90 days of the date of EPA's response. If you choose to submit a RFR, please send a written request to the EPA Information Quality Guidelines Processing Staff via mail (Enterprise Quality Management Division, Mail Code 2821T, USEPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460); or electronic mail (quality@epa.gov). If you submit an RFR, please reference the IQG identifier assigned to this original Request for Correction (RFC # 21003). Additional information about how to submit an RFR is listed on the EPA Information Quality Guidelines website at https://www.epa.gov/sites/default/files/2020-02/documents/epa-info-quality-guidelines_pdf_version.pdf.

Sincerely,



H. Christopher Frey, Ph.D.
Assistant Administrator

cc: Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator for
Environmental Information, Office of Mission Support

Katherine Chalfant, Director of Enterprise Quality Management Division, Office of Mission
Support

ⁱ Dr. Egilman's original email was entitled as a Request for Reconsideration, but since we cannot identify a previous error correction request we are determining this to be an original Request for Correction under EPA's Information Quality Guidelines.

ⁱⁱ To support this request for an error correction, Dr. Egilman attached [40CFR763](#) related to Asbestos-containing Materials in Schools, in which EPA notes on page 781 that the cited Mandatory Transmission Electron Microscopy Method for airborne particles indicates a ratio of 5:1 or greater.