



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON D.C. 20460

April 21, 1992

OFFICE OF  
THE ADMINISTRATOR  
SCIENCE ADVISORY BOARD

EPA-SAB-IAQC-COM-92-005

Honorable William K. Reilly  
Administrator  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Re: Science Advisory Board Commentary on the Agency's Asbestos Program

Dear Mr. Reilly:

As we expressed in our letter to you of April 20, 1990, the SAB is concerned that the scientific basis for EPA's regulatory actions and guidance documents on asbestos have not had the benefit of review by the Science Advisory Board (SAB). You yourself indicated some concerns about past Agency decisions on asbestos in your address of June 12, 1990 to the American Enterprise Institute (AEI) entitled "Asbestos, Sound Science, and Public Perceptions." The report you received in September of 1991 from the Health Effects Institute (HEI) - Asbestos Research on "Asbestos in Public and Commercial Buildings: A Literature Review and Synthesis of Current Knowledge" is a comprehensive, up-to-date, and objective summary of the available data on human exposure, effectiveness of remediation procedures, and critical issues in toxicity assessment and exposure-response relationships.

In view of these concerns and developments, the Indoor Air Quality and Total Human Exposure Committee (IAQTHEC) of the SAB invited representatives of the Office of Research and Development (ORD) and the Program Offices having significant asbestos interests and responsibilities to provide a briefing on their current asbestos-related activities. The briefing was held during the Committee's public meeting in Arlington, Virginia on February 24-25, 1992. Presentations were made by Mr. Michael Beard (Atmospheric Research and Exposure Assessment Laboratory, Research Triangle Park - ORD) on asbestos and substitute fibers monitoring methods research, by Mr. Roger Wilmoth (Environmental Monitoring Systems Laboratory, Cincinnati - ORD) on asbestos control technology, and by Dr. Joe Schecter (Environmental Assistance Division - OPP&T) on regulatory concerns and actions currently

being considered, including coordination with OSHA, and possible responses to recent court decisions. Although representatives of OAR and OSWER were not present, some of their current and recent activities were discussed briefly by the ORD and OPP&T representatives in terms of their knowledge of past liaisons and cooperation.

We wish to commend Mr. Beard, Mr. Wilmoth, and Dr. Schecter for the time and effort that they made in preparing their presentations, and for their candor and responsiveness in the discussions with the members of the Committee that followed. Based on these discussions, the Committee was able to come to consensus on some preliminary concerns about the Agency's asbestos program and its capacity to meet its regulatory responsibilities and commitments to reducing future risk in cost-effective ways.

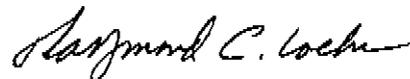
Our preliminary consensus concerns are as follows:

- 1) We heard no evidence that there is any strategic planning for addressing either important research needs or the implications of past research concerning the importance of fiber dimensions on inhalation hazard. The ORD programs for measurements and controls appear to be based on outmoded notions of which fibers need to be measured and controlled, and the scientists and engineers in ORD have not redirected, nor have been requested to redirect, resources to what they acknowledge is a critical need. In fact, there is an absence of guidance, in general, from the Agency's health scientists on the specification of the factors that govern toxicity.
- 2) There appears to be little, if any ongoing research on the critical issue of fiber properties affecting toxicity since the retirement of Dr. David Coffin from the Health Effects Research Laboratory (HERL). It is possible that replacement fibers for asbestos in products and buildings may be as hazardous or more hazardous than the asbestos products they replace. Such research is needed if the Agency is to make scientifically sound policy regarding asbestos and substitute products.
- 3) There does not seem to be any formal mechanism for coordination on hazard ranking, monitoring methodology, or control technology on an Agency-wide basis. It is necessary to bring together the expertise and insights of ORD, OAR, OSWER, OPP&T, and other Agency units having related interests in

asbestos. Further, there is no evidence of such coordination between involved Federal agencies.

Given the preliminary nature and incomplete coverage of our initial review of Agency programs in asbestos, we propose that the above concerns receive a more thorough examination at the next meeting of the IAQTHE Committee, which is tentatively scheduled for June-July 1992. We urge you to attend if your schedule permits, and to advise us if you have any particular concerns regarding asbestos which you would like us to examine. We hope that a further dialogue will prove valuable to you as you come to grips with the difficult issues in asbestos risk assessment and risk management that will confront the Agency in the near future, and for many years to come.

Sincerely,



Dr. Raymond Loehr, Chair  
Executive Committee  
Science Advisory Board



Dr. Morton Lippmann, Chair  
Indoor Air Quality and Total  
Human Exposure Committee  
Science Advisory Board

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