



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

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

March 24, 2009

MEMORANDUM

SUBJECT: Consultation on the Development of the Environmental Response Technical Assistance Document For *Bacillus anthracis* Intentional Releases (BA-TAD)

FROM: Deborah Y. Dietrich, Director /signed/
Office of Emergency Management

TO: Vanessa Vu, Director
Science Advisory Board Staff Office

This is to request that the Science Advisory Board (SAB) Homeland Security Advisory Committee (HSAC) conduct a consultation of the attached White Paper entitled "The Development of the Environmental Response Technical Assistance Document for *Bacillus anthracis* Intentional Releases (BA-TAD)".

Background

The EPA-chaired National Response Team (NRT) comprises 18 federal agencies that have major responsibilities for environmental protection, transportation, emergency management, worker safety, and public health. The Clean Water Act (CWA) provides the authority for the establishment of the National Response System, which contains the NRT, Regional Response Teams (RRTs), and Federal and State On-Scene Coordinators (OSCs). The NRT may consider and make recommendations to agencies on the training, equipping and protection of response teams and necessary research, development, demonstration and evaluation to improve response capabilities.

In response to the 2001 *Bacillus anthracis* incidents in Washington, the Weapons of Mass Destruction (WMD) Subcommittee of the Science and Technology Committee of the NRT developed an interim-final draft Technical Assistance Document (TAD) in 2003 for responses to an actual or suspected terrorist release of *Bacillus anthracis*. In July 2005, the NRT slightly revised the interim-final draft TAD (2003/2005 TAD) (Attachment 1).

In 2007, the NRT tasked the WMD Subcommittee with updating the 2003/2005 TAD. The updated 2003/2005 TAD will have a new title: Environmental Response Technical Assistance Document for *Bacillus anthracis* Intentional Releases (BA-TAD). The WMD Subcommittee conducted a chapter by chapter review of the 2003/2005 TAD to determine what information was still accurate, what needed updating and if there

were any data gaps. A brief summary of the content of the 2003/2005 TAD chapters and the approach the WMD Subcommittee plans for the BA-TAD is outlined in the attached White Paper (Attachment 2).

The NRT requested that EPA's Office of Emergency Response (OEM) seek consultative advice from the SAB HSAC on the WMD Subcommittee's development of the BA-TAD.

The SAB HSAC held a teleconference on October 15, 2008 and was briefed by the EPA and its partners on its progress in developing the draft BA-TAD. A Federal Register Notice dated September 29, 2008 (73 FR 56578-56579) announced this teleconference and provided background information on this advisory activity.

Following the teleconference on October 15, Dr. Baruch Fischhoff, Chair of the SAB HSAC, sent a letter to Stephen L. Johnson, then EPA Administrator, dated November 5, 2008. In his memorandum Dr. Fischhoff thanked the Office of Solid Waste and Emergency Response for seeking SAB input on the TAD. However, Dr. Fischhoff also expressed his concern that the Agency is not focusing on the critical issue of risk communication, citing a lack of systematic, scientific attention to communicating with the public. He asked that the anthrax task force clearly define the centrality of communication to the execution of the technical activities described in the TAD and demand the investment in scientifically sound communication. To respond to Dr. Fischhoff's concern, the workgroup has added a specific charge to the SAB (see No. 5 below) to seek input on scientifically sound communication which would be appropriate for this document.

Specific Request

OSWER and the WMD subcommittee request that HSAC provide advice on whether the attached plans to prepare the BA-TAD are properly directed, and if there are any items, issues or practical applications that have not been considered that ought to be included within the BA-TAD. The WMD subcommittee expects the HSAC will bring a broader scientific perspective to the BA-TAD document. In addition, the revision is at a stage where input from the HSAC will be most beneficial. We thank you in advance for your participation in this important project.

Consult Charge Questions

1. Given the intent that the BA-TAD will serve as a technical assistance versus technical methodology or resource document, what tools and strategies should be addressed in preparing the Federal On-Scene Coordinator (FOSC) to successfully manage and oversee the components of a response (i.e., characterization, decontamination, disposal, and clearance) to an intentional **indoor** release of *Bacillus anthracis* in industrial, commercial and residential buildings?
2. Given the intent that the BA-TAD will serve as a technical assistance versus technical methodology or resource document, what tools and strategies should be addressed in preparing the FOSC to successfully manage and oversee the components of a response (i.e., characterization, decontamination, disposal, and clearance) to an intentional **wide-area outdoor** release of *Bacillus anthracis*?
3. Are there worker health and safety issues, particular to *Bacillus anthracis*, the BA-TAD should address?
4. For critical infrastructures or wide-area locations, a "zero-culturable-spore" decontamination goal may not be achievable. What are possible cleanup strategies for minimizing risk to facilitate re-occupancy in industrial, commercial and residential buildings where a "zero-culturable-spore" decontamination goal was not achieved?

5. The FOSC would, in a *Bacillus anthracis* event, be functioning within the Incident Command System which typically includes a centralized communication structure with specific roles and responsibilities. The BA-TAD will address the key issues pertinent to the cleanup of environmental contamination with *Bacillus anthracis*. What recommendations does the SAB-HSAC have for scientifically-sound communications to be included in the BA-TAD? More specifically, for the purposes of the BA-TAD, what recommendations does the SAB-HSAC have for the content of these communications?

If you have any questions about this request, please contact Captain Colleen Petullo, U.S. Public Health Service, permanently assigned to EPA, at petullo.colleen@epa.gov or (702) 784-8004.

Attachments