



August 25, 2008

ORD Docket
Environmental Protection Agency
Mail Code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-ORD-2008-0523

Docket Officer:

The American Industrial Hygiene Association (AIHA) appreciates the opportunity to comment on the Draft Demonstration of Alternative Asbestos Control Method (AACM) Demolition for Two Asbestos-Containing Buildings and Expert Peer Review Meeting.

As the premier association of occupational and environmental health and safety professionals, AIHA members serve on the front line of worker health and safety. AIHA members, as well as employees and employers, rely on federal and state rules and regulations to improve the health and safety of the workplace and believe the issue of the hazards resulting from exposure to asbestos during demolition of asbestos-containing buildings is of the utmost importance.

The AIHA Construction Committee has reviewed the draft Demonstration Control Method offered by EPA, and has identified the following initial issues and concerns. We look forward to the opportunity to discuss these further prior to final publication of the Method.

AIHA Construction Committee Comments on EPA's AACM

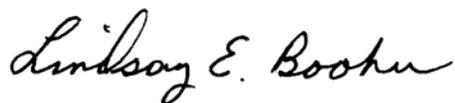
- It is recognized that cities and counties are eager for a less expensive method to demolish old structures with asbestos containing material (ACM) than the current method, and EPA's AACM purports to accomplish this objective.
- The overarching premise of the AACM is that if the ACM is maintained in a wet condition, exposures are very low.
- It does appear that this AACM offers quicker but comparable control of asbestos before demolition under controlled circumstances.
- Either method is dependant on accurate identification of ACM and good quality control of the treatment process. But there are concerns about lack of adequate quality control without skilled industrial hygiene support.

- There remains continuing concern that the EPA 1% definition of asbestos allows uncontrolled demolition with no special personal protection where trace asbestos is consistently present (but under the arbitrary limit of 1%). Resulting exposures may be comparable to conditions where materials with an asbestos content of 1% are disturbed.
- However, several questions remain unanswered:
 - ❖ How will proper and sufficient wetting be verified during demolition activities; how will adequate wetting be defined?
 - ❖ To what extent are various forms of ACM water permeable, since surface wetting is likely to be ineffective at dust suppression when ACM with interior dry areas is fragmented, crushed, or pulverized during demolition?
 - ❖ What particle sizes, velocities, and momentums result during pulverization of various forms of ACM during demolition? What water flows and droplet dispersions are required to assure particle capture?
 - ❖ Is whole building enclosure (presumably more costly than traditional ACM encapsulation and removal) required to provide a reasonable certainty of droplet encounter to assure capture of dispersed ACM?
 - ❖ What happens to the excess water 'run off'?
 - ❖ How will the debris from demolition be disposed of?
 - ❖ Do you have to dispose of the soil after the demolition?
 - ❖ What about when you have asbestos materials that are hard to wet, i.e., inaccessible?
 - ❖ The circumstances during the demonstration were highly controlled and monitored. Can these be consistently applied during real world scenarios such as demolition of residential properties? Do the demonstration conditions represent the worse case demolition scenarios (e.g., low site humidity, high site temperature, high wind, high velocity dispersion, high ACM volume, low permeability or hydrophobic ACM, etc.)?

AIHA appreciates the opportunity to work with EPA to help achieve the mutual goal of protecting American workers and others from the hazards resulting from exposure to asbestos. We look forward to further opportunities to work with the agency on this and similar issues and regulatory priorities.

If AIHA can be of any further assistance, please contact me. Thank you.

Sincerely,



Lindsay E. Booher, CIH, CSP
AIHA President

cc: AIHA Board of Directors
AIHA Construction Committee