



At a Glance

Why We Did This Review

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), evaluated the EPA's Alternative Asbestos Control Method (AACM) experiments to assess the amount of asbestos released into the environment. During a separate OIG review, we found conditions that caused us to review the impact of a portion of the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP).

Since 1973, the EPA's Asbestos NESHAP regulation has allowed buildings that are structurally unsound and in imminent danger of collapse to be demolished without first removing regulated asbestos-containing materials. The demolition of these buildings resulted in the generation of highly contaminated asbestos runoff wastewater.

This report addresses the following EPA goal or cross-agency strategy:

- *Addressing climate change and improving air quality.*

Send all inquiries to our public affairs office at (202) 566-2391 or visit www.epa.gov/oig.

The full report is at: www.epa.gov/oig/reports/2015/20150616-15-P-0168.pdf

EPA Should Update Guidance to Address the Release of Potentially Harmful Quantities of Asbestos That Can Occur Under EPA's Asbestos Demolition Standard

What We Found

The AACM experiments show that under the EPA's Asbestos NESHAP standard, the demolition of buildings that are structurally unsound and in imminent danger of collapse, and constructed with an asbestos-containing joint compound or Transite, can release significant amounts of asbestos into runoff wastewater.

The untreated discharge of runoff wastewater can contaminate the soil at the site or the water into which it is discharged. The AACM experiments demonstrate that the amount of asbestos released into runoff wastewater can often exceed the legally reportable quantity for asbestos, which is 1 pound in a 24-hour period. As a result, the Asbestos NESHAP demolitions under the Code of Federal Regulations (CFR) at 40 CFR § 61.145(a)(3) could require notification to the National Response Center in compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) § 103 if a reportable quantity is released into the environment.

Upon a CERCLA § 103 notification, the EPA is tasked with determining the seriousness of the release and the need for an immediate response or cleanup. To be consistent with the CERCLA process where reportable quantity releases are occurring during Asbestos NESHAP demolitions, the EPA needs to assess the potential public health risk posed by these releases.

Under the EPA's asbestos demolition standard, demolishing buildings that are structurally unsound and in imminent danger of collapse can release enough asbestos into the environment to pose a potential risk to human health.

Planned Corrective Actions

The acting Assistant Administrator for Air and Radiation did not agree with our recommendations. However, the agency agreed that its guidance in the area reviewed was "dated and disparate" and proposed alternative corrective actions, which we accept. The actions include assembling a team of experienced asbestos experts to advise and assist the Office of Air and Radiation in producing an updated consolidated guidance document which has practical application to the regulated community. All recommendations are resolved.