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Subject: Attached Article

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J. Foster:

The attached article appeared as a guest editorial in the September issue of the American Industrial Hygiene Association Journal. It makes interesting reading and offers another viewpoint on managing the asbestos situation.

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MH-77623-MG-pkc

Att.
As above

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GUEST EDITORIAL

Asbestos in Buildings: To Remove, or Not to Remove, that is the Question?

Asbestos, once considered a primary adjunct to the fire and life safety of a building, has become the object of general concern because of its potential health effects if inhaled into the body. Time has not lessened the engineering attributes of asbestos, but since exposure to asbestos has triggered a public health experience, it has subsequently become the object of public scrutiny. The mere existence of asbestos-containing materials in a building's construction and its associated "potential risk" to human health has often caused various levels of panic and paranoia among the building's occupants. This engendered concern most often exists in the absence of any real or potential exposure data.

The reality of this possible "hazard" to humans is, in my opinion, beyond dispute from either lay or scientific communities. The unchecked release of asbestos-containing material into building air and subsequent generation of respirable fibers could unquestionably create a health risk.[1] It is my considered opinion that ASBESTOS IN PLACE IS SAFE. Only when asbestos is released into the "breathing air" does it become a hazard.

Building owners, both public and private, have had their responsibilities regarding asbestos-containing materials specifically outlined by a number of legislative acts, litigations and news media concentrations. The question of asbestos control and abatement boils down to alternatives: 1) Removal or 2) Retention management with diligent monitoring. The former appears to provide a "terminal" answer which may not be fully realized for many years; the latter only creates the concern of continuing problems and an eventual need to remove the asbestos.

With this and a naive ignorance of the involved variables in mind, a building owner or school board would readily opt for removal. My concern arises when the quality and experience of the current removal contractor as well as the latest "state-of-the-art" removal method are weighed against the risk of fiber release in the building.

My on-site experiences with these contractors and their removal methods throughout the U.S. have not reinforced my confidence in either contractor ability to remove asbestos competently or safely—especially at the present state of our knowledge and technical ability to define "safety." At the expense of future building occupants, asbestos removal contractors treat the removal of asbestos as an on-the-job learning experience. Whatever may be attained through this "learning curve" diminishes rapidly with the transient nature of the labor pool and its supervision. The level of quality in a contractor's crew tends to be only slightly elevated in those jurisdictions which require "training."

Quality control efforts are immediately compromised by air quality assessment techniques which, if adequate, are either unavailable or priced beyond the limits of practicality. By submitting to "bureaucratic compromises" in fiber-in-air assessment, we find ourselves enjoying the "security" of negative results.

In light of the above considerations, the removal of asbestos from a building should be considered a "last resort." The risk of removal deficiencies must be seriously weighed against the "relief" of having the problem gone.

The obvious deterioration of the asbestos-containing material is NOT a condition which can be ignored. As the best available industrial hygiene science dictates, these areas must be repaired, enclosed or removed. If removal is the only option in these areas, strict vigilance must be the keynote.

Fiber release—at levels far greater than that already existing in a subject building—is a "given" in any removal operation. The quality of a removal project is not readily discernible by today's science and virtually invisible to the naked eye. A poorly managed project can, without doubt, leave a "lethal legacy" for occupants of generations to come.

I offer this caution to school and building owners faced with asbestos-containing materials: weigh your options carefully. Although legislated mandates strongly "suggest" removal as the ultimate solution, agencies are beginning to reverse their position as their experience with the consequences of removal falsifies the validity of the above argument.[2] I am sure there are some competent, qualified and concerned contractors somewhere, but I have not been fortunate enough to find them. Luckily, time is on our side. The institution of an operations and maintenance control program—where asbestos-containing materials are securely in place—can buy us the time we need to assess and improve our removal science and skills. Think twice before you plunge into the pool of paranoia surrounding asbestos mania.

References

1. National Research Council: *Asbestiform Fibers: Nonoccupational Health Risks*. Board on Toxicology and Environmental Health Hazards, Commission on Life Science. National Academy Press, Washington, D.C. (1984).
2. U.S. EPA: *TSCA-Bulletin*. Washington, D.C. (December 1984).

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