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FOREPA SAYS FOREWORD TO ASBESTOS
'GREEN BOOK' IS MISLEADINGund
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The foreword to the Environmental Protection Agency's (EPA) Green Book on asbestos in buildings could mislead readers, agency officials said in a letter to one of the publication's critics last month. However, the agency defends the complete explanations of the "five facts" about asbestos featured in the book, "Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials."

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"We have decided that we will not use them in this shortened version again," Robert McNally, chief of EPA's Assistance Programs Development Branch, wrote in a Feb. 11 letter to Scott Schneider, an industrial hygienist at the Occupational Health Foundation. In a Sept. 11, 1990, letter to McNally, Schneider called the Green Book's foreword "critically flawed" and made other criticisms of the book.

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McNally's letter gave the following responses to Schneider's questions about the five facts:

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Fact One: "It is important to note that we do not say that risk is negligible or zero; we say that it may be negligible or zero. We do know that risk approaches zero as exposure approaches zero." Fact Two: "We agree that the data are too limited to draw definitive conclusions. That is why we qualified our statement. We believe, however, that the readers of the document will be able to understand that qualification."

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Fact Three: "You write that 'EPA has done no surveys, as far as we know, to demonstrate that removal is not the best course of action or what percent of time it is or is not the best course of action.' We do know that when asbestos-containing material is in good condition, it does not release fibers into the air. Thus, an improper removal of undamaged material can create a dangerous situation where none existed previously. From our national survey of buildings, only 14 percent contain damaged, friable, asbestos-containing material. In 86 percent of the nation's buildings, an improper removal of the undamaged asbestos material could create a dangerous situation where none existed previously."

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Fact Four: "You write that 'EPA has never determined whether its [National Emission Standards for Hazardous Air Pollutants] rule is sufficiently protective to prevent all significant public exposures. We are simply stating in this fact what the requirement is and why we have it. We do not conclude that this requirement is completely successful in preventing all significant public exposure. In fact, on page 2 of the Green Book, we indicate that 'removal of some ACM in a building will be necessary if the material has been damaged beyond repair.'" Fact Five: "You point out that the need to inspect first should have been stressed. Although we do not state so explicitly in the foreword ... EPA does recommend building inspection and assessment to determine whether an asbestos control and management program should be implemented."

In issuing the Green Book, EPA hoped the five facts would help strike a balance between two extreme views of asbestos: "one fiber can kill" versus "most fibers are safe," McNally explained. When coupled with the more detailed recommendations in the main text of the Green Book, EPA is confident the five facts will help convince people to identify, assess and manage the asbestos-containing materials in their buildings.

Schneider said March 13 that he plans to respond to McNally's letter within the next few days. He contends that the Green Book "gives people a false sense of security" about operations and maintenance programs for asbestos.

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