

IN ITS OWN WORDS--EPA'S STATEMENTS CONCERNING ASBESTOS RISKS AND SOIL CONTAMINATION

Asbestos Is Dangerous--"There is no known safe level of asbestos exposure. Pursuant to Section 112 of the Clean Air Act, 42 U.S.C. § 7412, asbestos has been determined to be a hazardous air pollutant, presenting a significant risk to human health as a result of air emissions. Diseases associated with asbestos exposure include asbestosis, mesothelioma, cancer of the lung, and cancer of the gastrointestinal tract." (EPA Region 7 Letter to St. Louis Airport Authority, July 9, 2003).

The Airport Authority's Asbestos Demolitions Violated the Clean Air Act--"EPA learned in January 2003 that instead of removing all friable asbestos from facilities prior to demolition as required by the asbestos NESHAP regulations, the Airport Authority has been using a 'wet demolition' process, whereby the facility is wetted down prior to and during demolition, with the asbestos left in the facility for demolition." (EPA Administrator Whitman Letter to Senator Bond, May 14, 2003).

The Violations Are Massive--"Approximately 275 residences containing ACM [asbestos-containing material] were demolished by the wet process to date." (EPA Report, "St. Louis Airport Expansion Demolitions Data Evaluation," August 6, 2004).

The Demolitions Likely Released Asbestos to the Air and to Soil--"We also have substantial evidence that even with the wetting of ACM that there will still be release of airborne asbestos fibers, albeit in reduced concentrations. . . . No information from . . . the scientific literature provides a basis for assuming that off-site releases will be harmless, inconsequential, or not potentially result in contamination of area soils, dusts, and structures." (Memorandum from Dr. Aubrey Miller, Senior Medical Officer and Toxicologist, EPA Region 8, to EPA Asbestos Coordination Team, May 10, 2004).

"[B]y not first removing RACM [regulated asbestos-containing material], one greatly increases the chance of soil contamination, and/or leaving RACM debris at the site..." (EPA Region 7 Letter to Missouri Dept. of Natural Resources, November 17, 2002).

"EPA has reviewed and evaluated the St. Louis Airport Authority's air monitoring data from some building demolitions that used a 'wet method' to control asbestos instead of the traditional method prescribed by the National Emissions Standards for Hazardous Air Pollutants (NESHAP). . . . The lack of asbestos fiber data keeps EPA from stating with certainty that there was no release of individual asbestos fibers, and the limitations of the data mean that no conclusions can be drawn about the effectiveness of the wetting process for individual buildings." (EPA Region 7 Press Release, August 6, 2004).

Asbestos-Contaminated Soil Can Re-Release Asbestos When It Is Disturbed--"Any activity that causes asbestos-bearing soils and/or rocks to be disturbed can potentially result in releasing asbestos fibers into the air.... A number of factors can influence how long any fibrous material, including amphibole asbestos, stays airborne and how far it travels before settling... EPA is not aware of any scientific studies that systematically address how each factor can influence airborne time and/or distance traveled." (EPA Region 9, "Naturally Occurring Asbestos in El Dorado Hills: Questions and Answers," June 9, 2004).

"Recent data from the Libby[, Montana] site and other sites provide evidence that soil/debris containing significantly less than 1 percent asbestos can release unacceptable air concentrations of all types of asbestos fibers..." (EPA Memorandum, "Clarifying Cleanup Goals and Identification of New Assessment Tools for Evaluating Asbestos at Superfund Cleanups," August 10, 2004).