

## EXECUTIVE SUMMARY ON DRAFT "ACT" GENERAL COMMENTS MATRIX

The following table presents, in summary form, an assessment of the degree to which the general comments from the internal peer review of the Ft. Worth Method by the Asbestos Coordination Team have been addressed in the Region VI, April 1, 2004 revision of the Ft. Worth Method documents.

The EPA Asbestos Coordination Team (ACT) was asked to submit comments on the Ft. Worth Method by Region VI. The ACT submitted both general comments and comments of individual members; all comments were expected to be responded to and addressed. In response to the comments, the QAPP and Method document were revised and a Remediation Plan (RP) was developed; these three documents will be referred to as the April 1, 2004 Revision. In addition, various "responses to comments" documents were also prepared by Region VI. These documents were then given by Region VI to an external peer panel for a letter review; the comments from the peer review panel were distributed on April 29, 2004.

The attached ACT general comment matrix summarizes the following three documents:

- 1) The general ACT comments on the Fort Worth Method;
- 2) The Region VI response to the general ACT Comments;
- 3) The Peel Panel Letter Review

The matrix also contains an assessment of the degree to which the April 1, 2004 revised Ft. Worth Method addressed the general ACT comments. This assessment was prepared by an ACT member, is in draft form and is in the process of being reviewed and commented on by the full ACT.

The peer panel that reviewed the April 1, 2004 revision was not presented with the ACT comments. Therefore, if an external peer reviewer makes a comment that is the same or similar to an ACT comment, this independently validates and confirms the ACT's comments and concerns that have not been addressed as of yet.

Based on the internal assessment and the external peer review, there are important outstanding issues with the revised Ft. Worth Method that have not been addressed. The Ft. Worth Method documents still:

- Do not ensure that releases will be detected;
- Do not ensure that releases will be controlled;
- Lack detail on how OSHA compliance will be assured;
- Do not clearly establish who will have professional responsibility and authority when on-site decisions need to be made, such as "stop work orders;"
- Do not adequately define or describe how RACM would be adequately wetted;
- Do not ensure sufficient and fully informed community involvement;
- Do not ensure monitoring that will allow assessment of risk to workers or residents;
- Do not ensure that momentary releases will be detected or controlled;
- Do not have adequate remediation plans.