

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

SEP 3 0 2008

OSWER Directive 9200.0-68

## MEMORANDUM

SUBJECT: Transmittal of Framework for Investigating Asbestos-Contaminated Superfund Sites

- FROM: James Woolford, Director January Office of Superfund Remediation and Technology Innovation
- TO: Superfund National Program Managers, Regions 1-10

#### Purpose

The purpose of this memorandum is to transmit the document: *Framework for Investigating Asbestos-Contaminated Superfund Sites* (Framework). The Framework provides guidance for assessing sites contaminated with asbestos that are being addressed under the authority of Superfund. This guidance recommends a general process for site assessment that is supplemental to existing Superfund site and risk assessment guidance.

#### Background

This Framework was developed to provide remedial/removal managers, remedial project managers, on scene coordinators, and site assessors with information needed to assist in the evaluation of asbestos risks at hazardous waste sites. Historically, asbestos has been addressed in the Superfund program by reference to the term asbestos-containing material (ACM), defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, as materials containing >1% asbestos. OSWER Directive 9345.4-05 (Clarifying Cleanup Goals and Identification of New Assessment Tools for Evaluating Asbestos at Superfund Cleanups, EPA, August 2004) indicated that the 1% definition may not be reliable for assessing potential human health hazards from asbestos-contaminated soils at Superfund sites. This Framework implements the August

2004 Directive by recommending a risk-based, site-specific approach for site evaluation based on current asbestos science.

### Implementation

The TRW Asbestos Committee recognizes that asbestos site assessment can be very challenging in the absence of a risk-based soil value. OSRTI also recognizes that asbestos risk assessment is an area of active research. The Framework is designed with the necessary flexibility to facilitate site decisions under conditions of incomplete characterization and to accommodate the varied nature of environmental asbestos contamination and emerging risk science for asbestos. While the Framework provides guidance for site assessment, data gaps remain in the areas of analytical methods and toxicity of asbestos. These are needs that go well beyond the scope of developing the Framework; EPA will address these needs through ongoing research and development of additional implementation tools and guidance.

The TRW Asbestos Committee is available to respond and provide support to the Regions and other stakeholders in the use of the Framework. A technical support help line is available (via phone or e-mail <u>asbestoshelp@epa.gov</u>) or a member of the Asbestos Committee may be contacted directly (members are listed below). Upon release of the additional guidance or implementation tools, the OSRTI/Asbestos web page will be updated to highlight the support mechanisms.

#### Attachment

CC:

Susan Bodine Barry Breen Scott Sherman OSRTI Managers Ed Chu, CPA Debbie Dietrich, OEM Matt Hale, OSW David Lloyd, OBLR John Reeder, FFRRO Marcia Mulkey, OSRE David Kling, FFEO Mary-Kay Lynch, OGC Wendy Lubbe, Superfund Lead Region Coordinator, Region 7 NARPM Co-Chairs

### **TRW Asbestos Committee Members**

<u>Co-Chairs</u> Jim Konz (OSRTI) Arnold Den (Region 9) Mark Maddaloni (Region 2)

Committee Members Sarah Levinson (Region 1) Chuck Nace (Region 2) Jack Kelly (Region 3) Nardina Turner (Region 4) Sonia Vega (Region 5) Anna Milburn (Region 6) Dave Williams (Region 7) Helen Dawson (Region 8) Mary Goldade (Region 8) Wendy O'Brien (Region 8) Wendy O'Brien (Region 8) Dan Stralka (Region 9) Gerry Hiatt (Region 9) Jed Januch (Region 10) Julie Wroble (Region 10)

Keven McDermott (Region 10) Brian Brass (ERT) Terry Smith (OEM) Chris Weis (OECA) Stiven Foster (OSWER) Danielle DeVoney (ORD) Beth Holman (OSRTI) Bill Barrett (ORD) Eugene Lee (OEM) Deirdre Murphy (OAQPS) John Smith (OPPTS) Mark Johnson (ATSDR) John Wheeler (ATSDR)