

# History of AACM Method

- City of Fort Worth XL Project 1997 expanded use of emergency provision of Asbestos NESHAP for substandard structures – Phased approach
- Cow Town Inn City of Fort Worth withdrew XL submittal 2003
- EPA Region 6 and ORD continued dialogue for next steps – development of Alternative Asbestos Control Method Research

### "Wet Method not AACM"

The AACM is not the <u>"Wet Method or Fort Worth Method"</u>

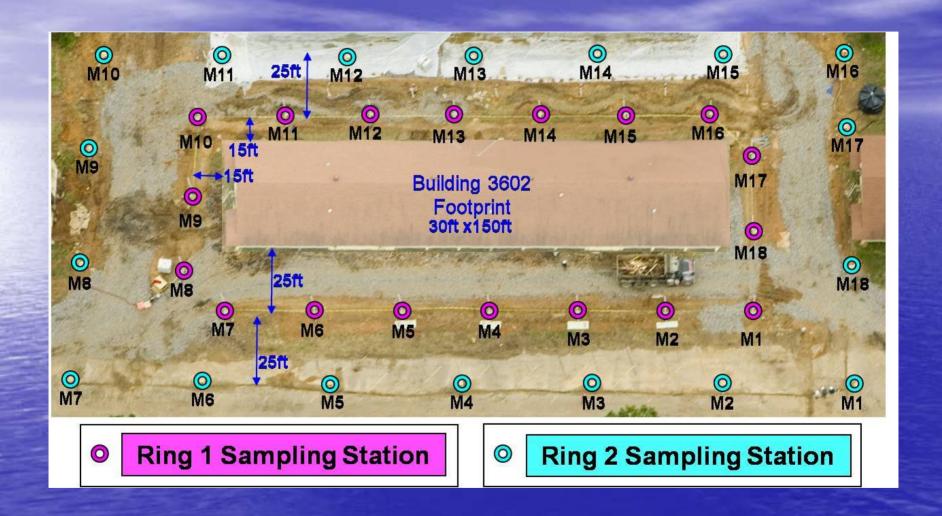
- Emergency Provision of Asbestos NESHAP
  - Provides owners of structures in "imminent danger of collapse" use of water, all asbestos remains, during demolition with notice to State

## AACM1

- Fort Chaffee, AR
- Identical buildings (one by AACM other by NESHAP)
- Positive Asbestos wall systems and VAT
- Soil



Reference area for visual estimation of relative component percentages









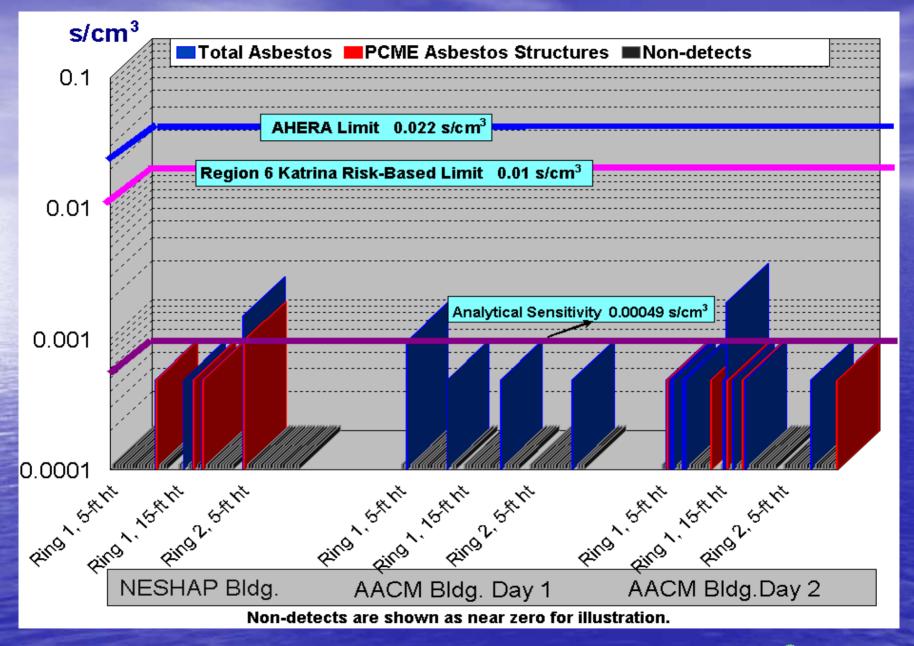




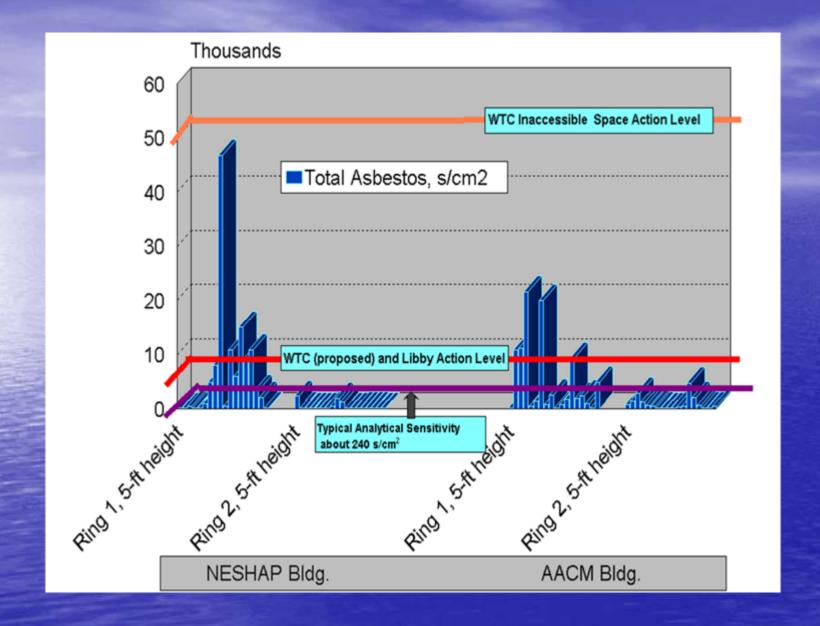




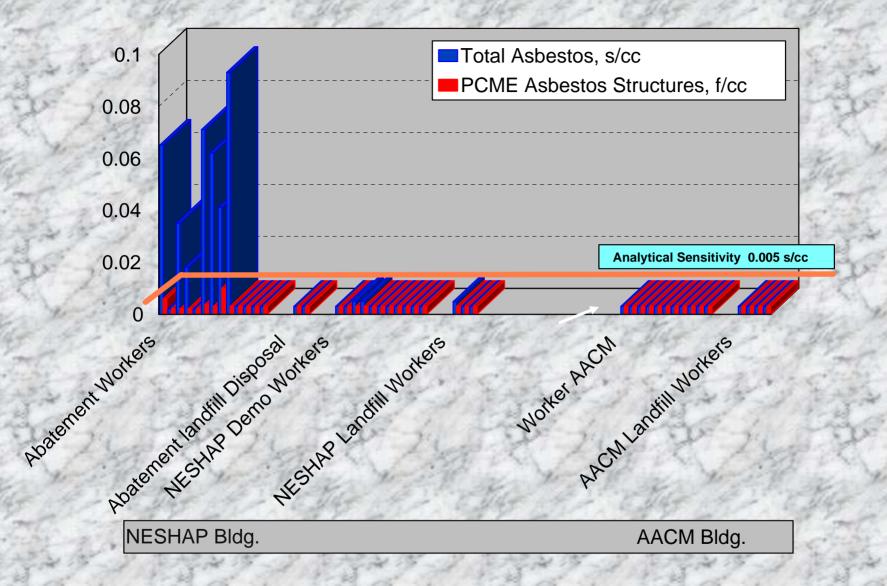




#### AACM1 Airborne Asbestos, s/cm<sup>9</sup>

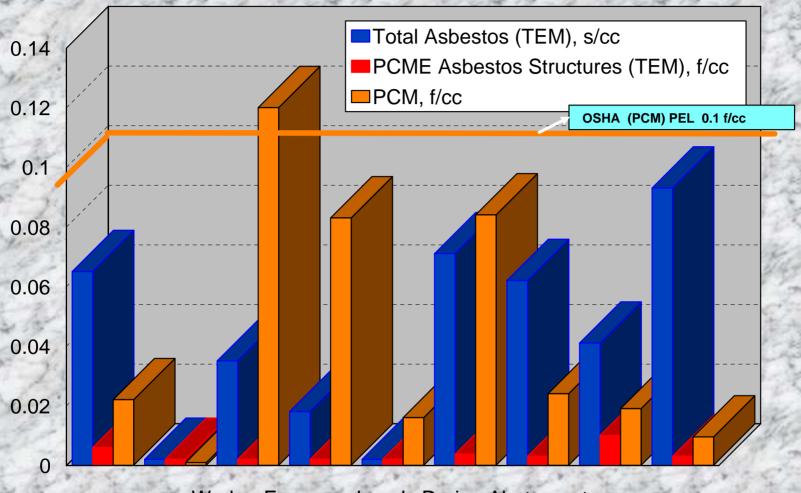


#### AACM1 Dust Asbestos Loading, s/cm2

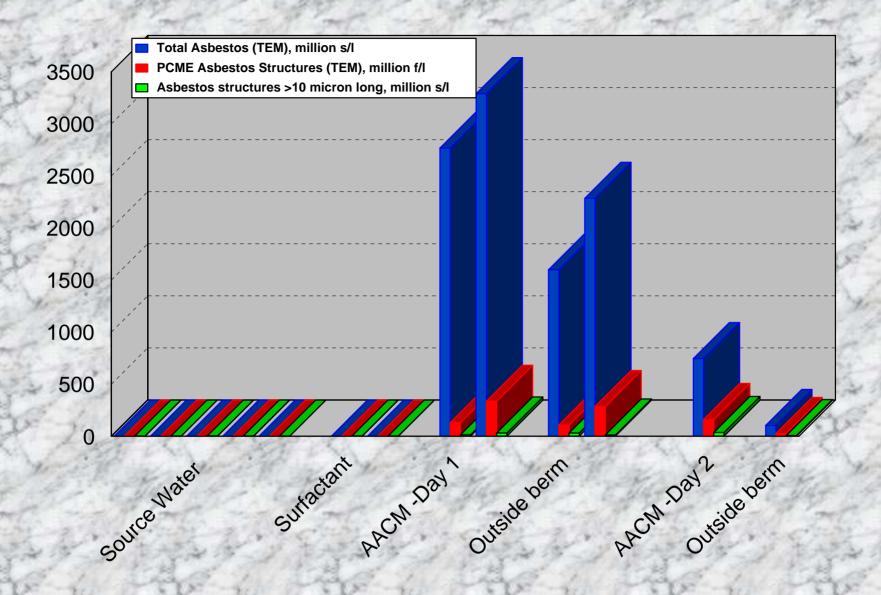


### AACM1 Worker Breathing Zone Asbestos, s/cm³

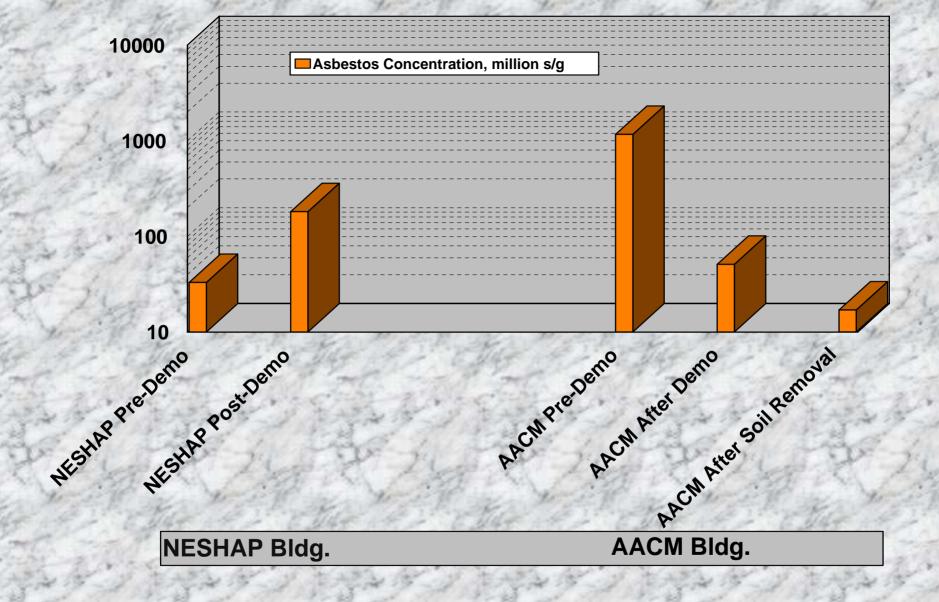
## Worker Asbestos Fiber/Structure Concentrations During Abatement of NESHAP Building at Fort Chaffee



Worker Exposure Levels During Abatement



AACM1 Water Asbestos, Ms/I



AACM1 Mean Soil Asbestos, million s/g

# AACM vs NESHAP at AACM1 Research

- Over six times faster
- Cost half as much
- Less asbestos in final soil
- Lower worker breathing zone asbestos levels

## AACM 2

- Fort Chaffee, AR
- Single building in danger of imminent collapse
- Transite siding
- Pavement





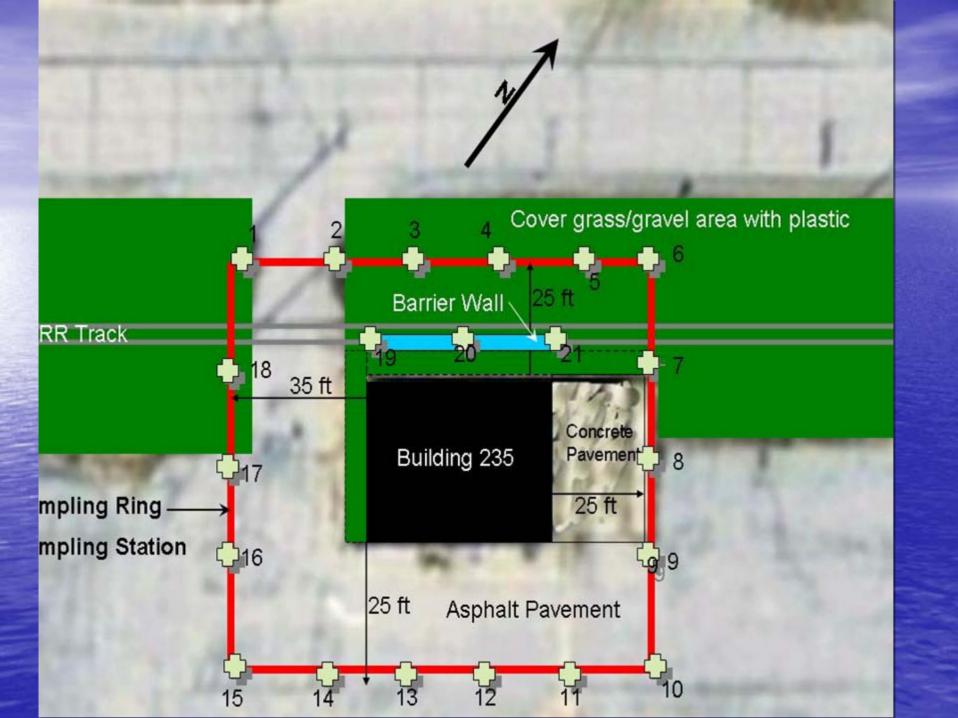


























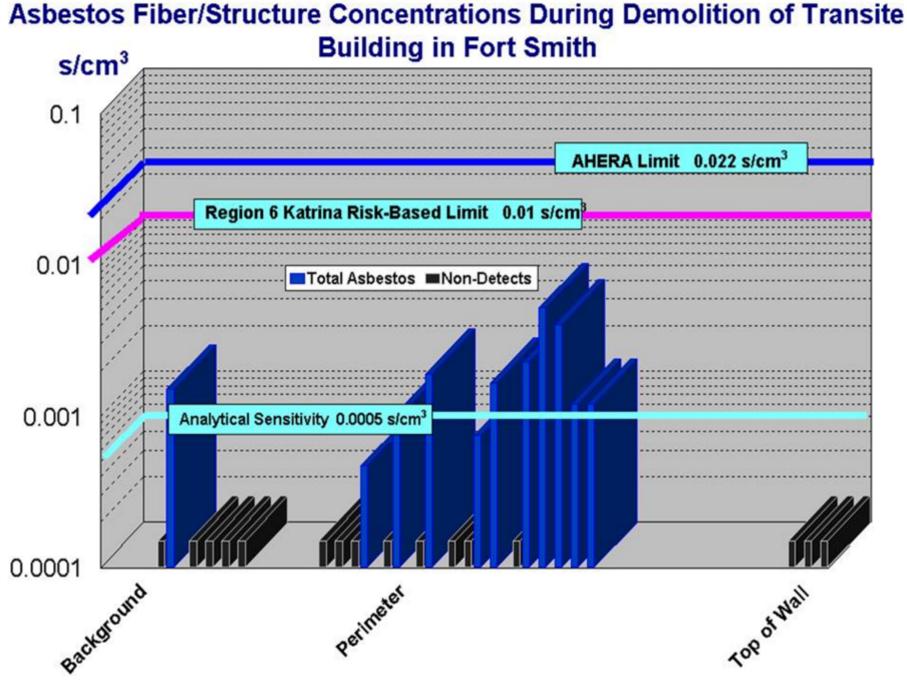




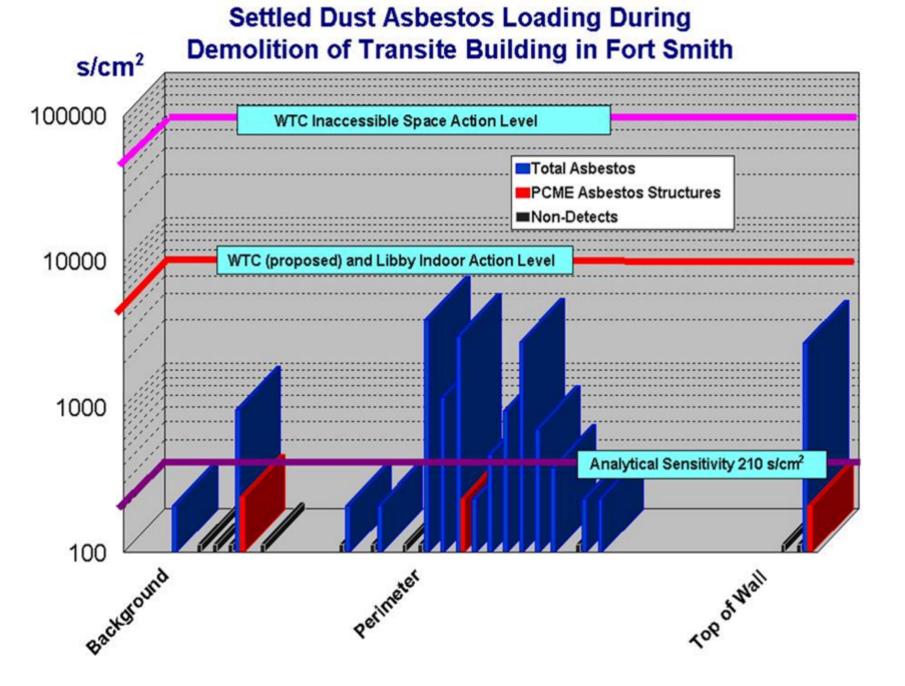




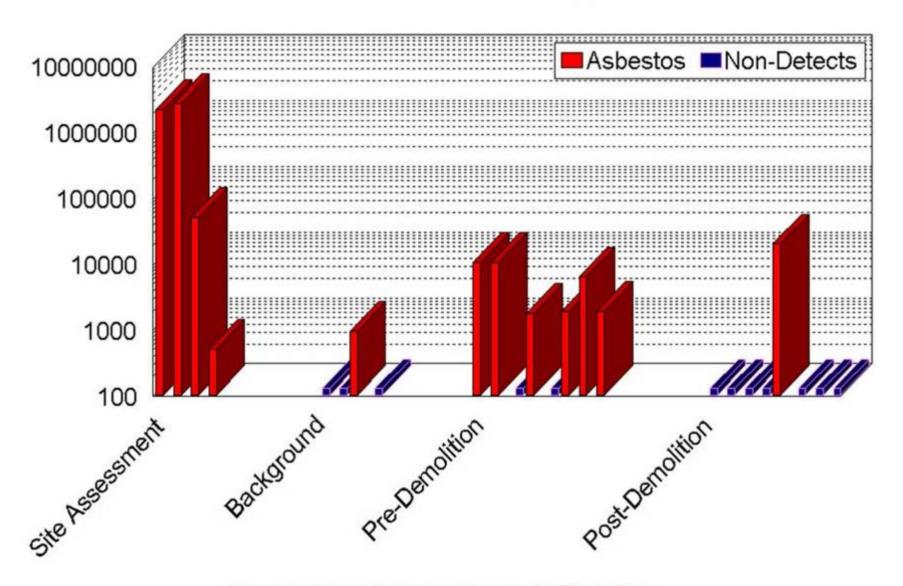




Non-detects are shown as near zero for illustration.



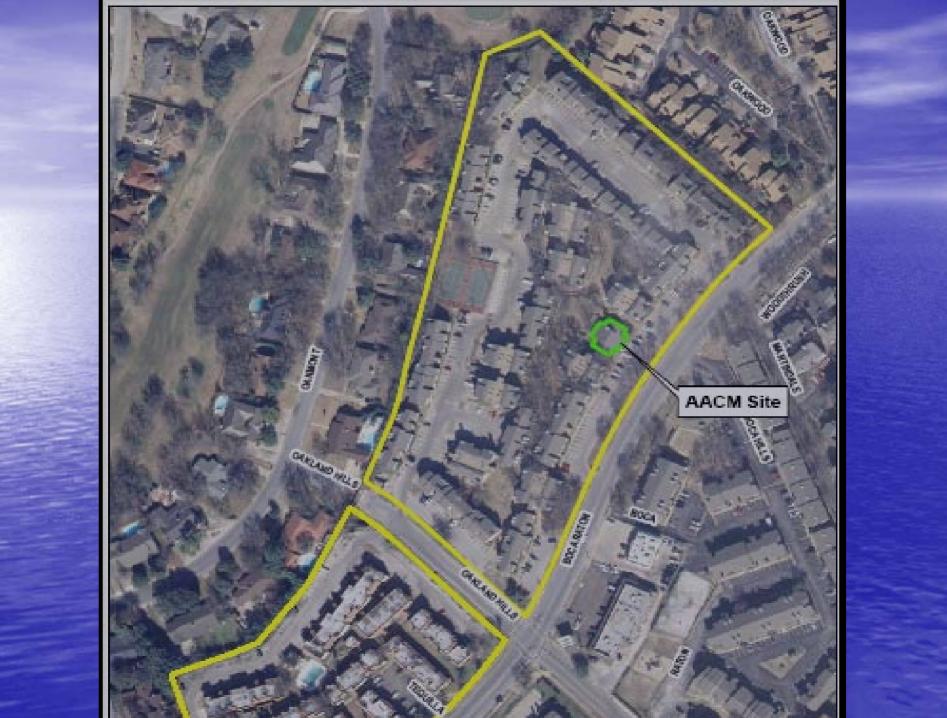
## Pavement Asbestos Loadings at the Transite Building, s/cm<sup>2</sup>



Non-detects are shown as near zero for illustration.

## AACM 3

- Fort Worth, Texas
- Single building
- Popcorn Ceiling, troweled on surfacing on walls
- Pavement and soil



































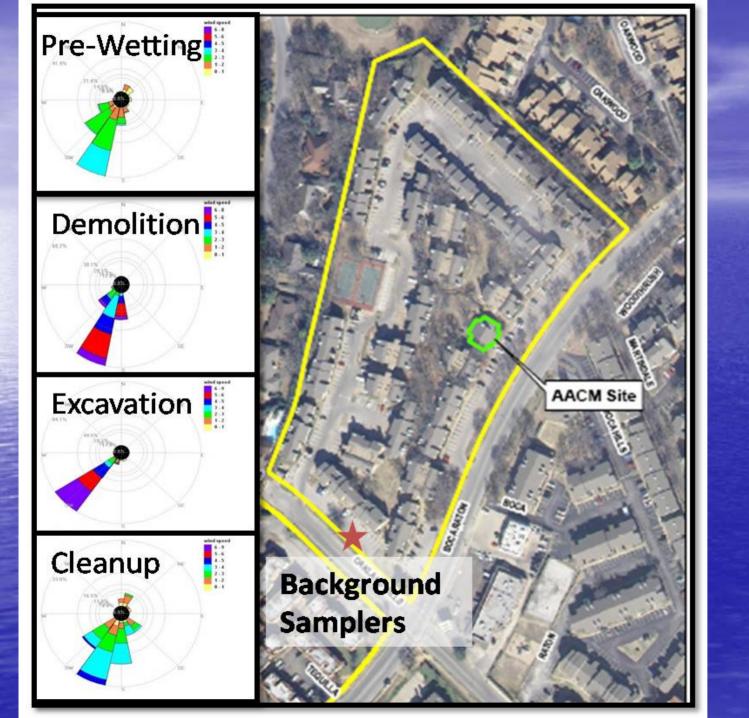


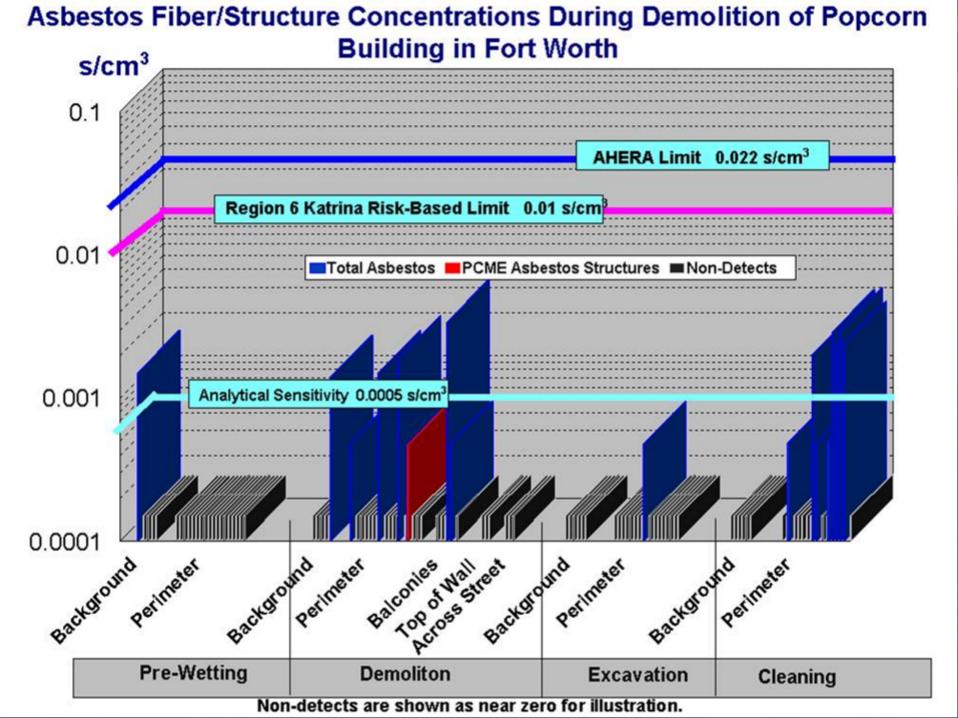


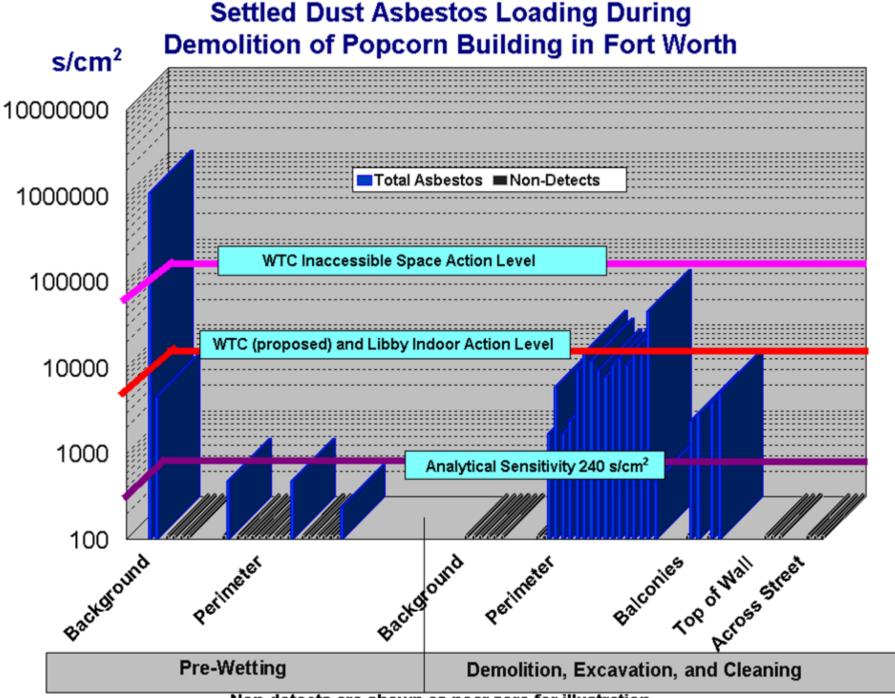






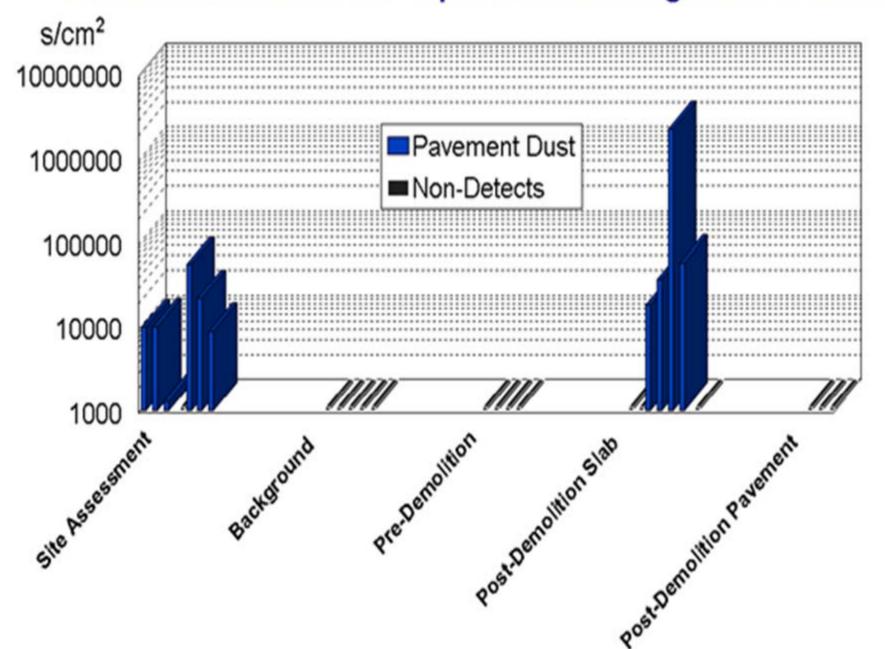




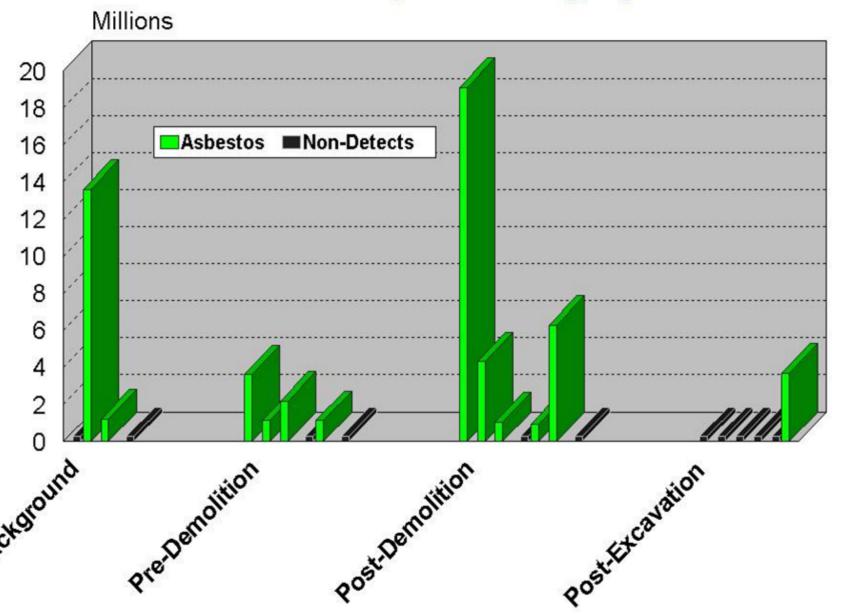


Non-detects are shown as near zero for illustration.

#### Pavement Dust at Popcorn Building Demolition

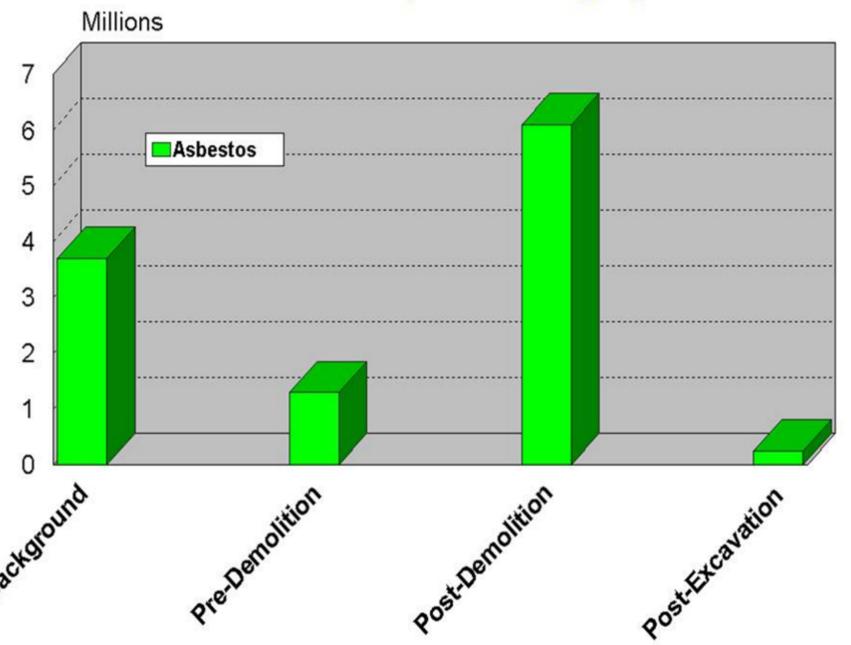


#### Soil Asbestos Concentrations (TEM) During Demolition of Popcorn Building, s/g



Non-detects are shown as near zero for illustration.

#### Mean Soil Asbestos Concentrations (TEM) During Demolition of Popcorn Building, s/g



# COMPARISON OF AACM1,2, and 3

## All asbestos has been removed before a NESHAP demolition....?

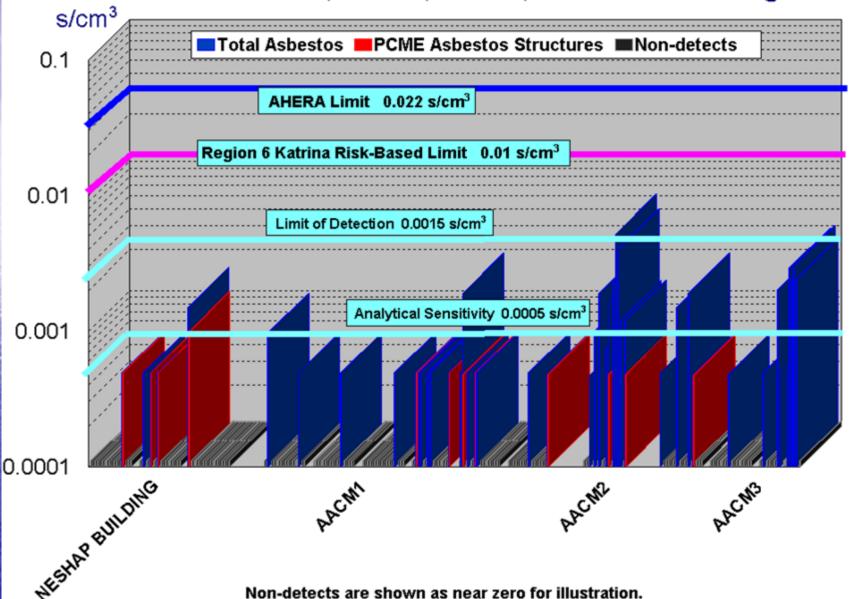
#### Material

- Joint Compound
- Surfacing
- VAT
- Pipe wrap
- Caulk
- Roofing
- Mastic

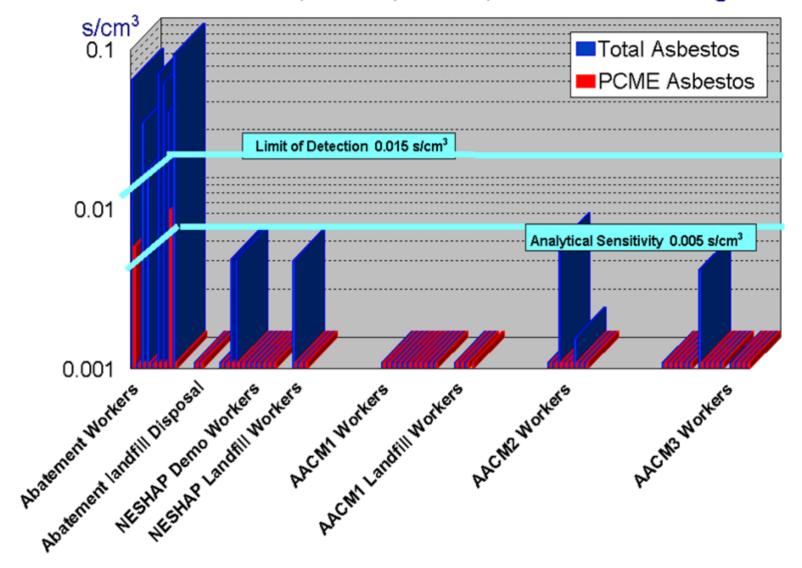
#### **Amounts**

- Less than 260 sq ft
- content less than1.5%
- Less than 160 If

#### Airborne Asbestos Concentrations (TEM) During Demolition of AACM1 NESHAP, AACM1, AACM2, and AACM3 Buildings

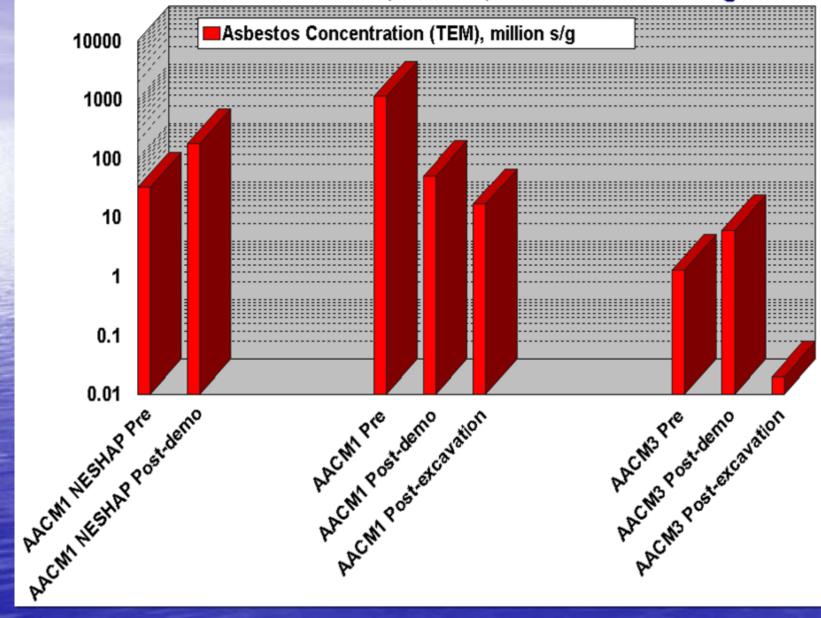


#### Worker Breathing Zone Asbestos Concentrations (TEM) During Demolition of AACM1 NESHAP, AACM1, AACM2, and AACM3 Buildings



Non-detects are shown as near zero for illustration.

### Mean Soil Asbestos Concentrations (TEM) During Demolition of AACM1 NESHAP, AACM1, and AACM3 Buildings



#### Lessons Learned

- Location, location, location .....
- The AACM Research Demonstrated Site specific on results, State, local, contractors and cost analysis (landfill distance, abatement practices, etc.)
- Research places additional emphasis on oversight and implementation efforts – is this real world application?

#### EPA Responsibilities To Public

- EPA Research driven by questions raised on issues and concerns raised internally as well as externally to the Agency. (Champion Necessary)
- Under the Clean Air Act Asbestos NESHAP first air rule written in 1973, amended in 1990
- CAA requires Reg review every 5 years has it run it's course, what changes are necessary, etc.?

#### Peer Review Schedule

Peer Review Process:
 FR Notice Published July 21, 2008
 Comment Period Ended September 1, 2008

Second FR Notice – Published August 27, 2008 - Peer Review Committee Convened/Public Meeting Held on September 11-12, 2008, Cincinnati Lab

#### Public Comments Located

 Docket ID number EPA-HQ-ORD-2008-0523

Reports Located: <a href="http://www.regulations.gov">http://www.regulations.gov</a> and through <a href="http://www.epa.gov/region6/6xa/asbestos">http://www.epa.gov/region6/6xa/asbestos</a> <a href="http://www.asbestos">.htm</a>

## Next Steps

Peer Review Final Report – inclusion of panel comments, public comments and summary report of 2-day meeting

EPA receipt of Final Peer Review Report

## Next Steps-Continued

- EPA Finalizes AACM#2 and AACM#3
   Research Reports Release of Peer
   Review Report and Final EPA Reports –
   occur simultaneously –posted on web
- Agency will prepare for internal discussions on next steps once Science completed.

## Next Steps - Continued

- What should EPA do next? Open Forum Discussions with outside parties: States, Tribes, Municipalities, Counties, Redevelopers, trainers, asbestos workers, unions, environmental groups, interested stakeholders, federal partners, etc.
- Should Asbestos NESHAP be reviewed? Should these discussions occur? If so, how should these discussions be convened? When? Where?

#### Questions??

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