



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

OFFICE OF  
RESEARCH AND DEVELOPMENT

**MEMORANDUM**

**SUBJECT:** Alternative Asbestos Control Method (AACM)

**FROM:** Kevin Teichman  
Deputy Assistant Administrator (ORD)

**TO:** Paul T. Anastas  
Assistant Administrator (ORD)

I have reviewed the AACM materials provided to me and have concluded that there are important technical deficiencies that remain that will require resources (both FTE and dollars) to attempt to resolve. For example, additional time and money would be needed to run the AERMOD model, EPA's preferred model, to replace the ISCST3 model results currently used in the AACM reports. Also, some of the technical problems that arose during sampling and analysis would be difficult to adequately address, because there is no longer an opportunity to gather and analyze data.

Since the Agency is not considering modifying the Asbestos NESHAP at this time, I think it would be more prudent to use our available resources to provide OAR and others support on their higher priority research needs.

Please indicate your concurrence or non-concurrence with my recommendation by signing below.  
Thanks.

Concur Paul T. Anastas

Date 7/29/11

Non-Concur \_\_\_\_\_

Date \_\_\_\_\_