

Testimony for April 12, 2004 Meeting of EPA WTC Expert Technical Review Panel

Why is this environmental disaster different from all other environmental disasters? The word 'unprecedented' is used ad nauseam to describe it. But in crucial ways, the environmental consequences of 9/11 do have precedent and EPA has established protocols to clean up the contaminants that were released. Why are they not following them here? Why are they reinventing the wheel in the shape of a triangle? If this disaster was greater than its predecessors, all the more reason why state-of-the-art testing and cleanup should have been and still should be instituted ASAP. (Concerning EPA's testing methods, see Cate Jenkins' memo of July 4, 2003.) Instead EPA says on the one hand, "Poor us, this was unprecedented" and on the other, "But there's no problem."

In addressing the questions that EPA has put to you, the panel should also consider whether they are the best questions to be asking. For instance, concerning asbestos as surrogate, the panel should question the assumption that any one contaminant can serve as a surrogate for the hundreds that were released by the disaster and subsequent fires. Asbestos coated the first forty storeys of the North Tower. The World Trade Center also held 500,000 of fluorescent light bulbs each of which contained enough mercury to contaminate a quarter of a city block; fifty thousand computers each made with four to eight pounds of lead; (Fallout, Juan Gonzalez) smoke detectors which may have contained radioactive americium 241. (Conversations with Hugh Kaufman, Policy Analyst at EPA.)

"From September 23 - November 21 at Church and Dey dioxin was 10-170 pgTEM/m³, the highest levels ever recorded "

EPA Exposure and Human Health Evaluation of Airborne Pollution from the World Trade Center pp 76-77

Dioxin can adsorb onto the surface of fine particulate matter and EPA should not neglect this as well as very and ultrafine particulates in its consideration of contaminants of potential concern.

"Numerous PCB congeners... were detected at high concentrations. The Toxic Equivalency...is 151pg/L. In previous harbor work... the highest observed PCB TEQ was 0.002 pg/L." (EPA report Sept 20 2001 from Juan Gonzalez' Fallout p 73.)

This means that EPA found PCBs which were 75,000 times the previous record.

Asbestos contributed c. 5000 tonnes to the total debris. (Sigrun Davidsdottir in the Guardian. Gonzalez gives a much lower figure but to give EPA the benefit of the doubt, I will use the higher one.) There were 1.6 million tons of debris at Ground Zero alone, excluding the plume. So asbestos comprised less than one three hundredth of the total debris. Whatever remains of the other 99.66% must also be cleaned up. And the decision of whether asbestos is an appropriate surrogate should not be left to scientists who may be industry representatives or asbestos experts but who were certainly chosen without input from the public. This panel should also consult experts in lead, particulate matter and other contaminants of potential concern.

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