

Institute for Health and the Environment
Department of Environmental Health & Toxicology
School of Public Health

A joint venture with the
New York State Department of Health
In affiliation with Albany Medical College



One University Place
Room B242
Rensselaer, NY 12144, USA

Phone: (518) 525-2660
Fax: (518) 525-2665
Carpent@uamail.albany.edu

UNIVERSITY AT ALBANY

STATE UNIVERSITY OF NEW YORK

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Joel R. Kupferman
New York Environmental Law & Justice Project
351 Broadway, #400
New York, NY 10013-3902

Dear Mr. Kupferman:

Thank you for the information on the lead and asbestos testing of balconies at Southbridge Towers.

Balconies pose an important problem because there are, in fact, extensions of internal living space, although they are obviously subject to contamination from outside sources. In my view, one should apply the same clean-up standards to balconies as to indoor living areas. For lead, the EPA/HUD hazard levels are 40 $\mu\text{g}/\text{ft}^2$ on floors and 250 $\mu\text{g}/\text{ft}^2$ on sills.

All of the balcony samples which I have seen reported exceed these values. I conclude the lead in the dust on balconies poses a significant health problem, and that these balconies should be cleaned. If there are high levels of lead on the balconies, one must assume that there are also high levels on the walls of the buildings. Furthermore, considering the fact that many surrounding buildings' exteriors were cleaned, I also conclude that Southbridge's exterior should be cleaned. Since the balconies are so close to the exterior walls, one could assume that the exteriors are tainted with lead and asbestos.

The asbestos results which I have seen are more complicated to interpret, since asbestos levels are usually presented as fibers per unit area. These results show asbestos as percentage of total dust weight. Three of four balcony samples show no detectable asbestos by quantitative analysis, while all samples show from a trace to less than 1% by TEM analysis. This higher value corresponds to the levels reported by Liou et al. (*Environ. Health Perspect.* 108:708, 2002) for dust obtained from three sites near the WTC in mid September. It is hard to estimate the public health hazard without knowledge of the areas which were sampled. However, asbestos should not be found on balconies and further testing should be done. I hope these comments will be of use. Best regards.

Sincerely,

David O. Carpenter, M.D.
Professor & Director

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