

# THE ROLE OF COMMUNITY ADVOCACY GROUPS IN ENVIRONMENTAL PROTECTION

**Example of September 11, 2001**

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## **LEARNING OBJECTIVES**

- To understand how community and labor-based organizations allied to press government agencies for a comprehensive emergency response to the environment during the aftermath of the September 11, 2001, attacks on the World Trade Center
- To be able to discuss the Community Advisory Committee (CAC) that resulted from the World Trade Center disaster

The terrorist attacks on the World Trade Center (WTC) in New York City on September 11, 2001, resulted in one of the worst environmental disasters ever to hit a major American city. This chapter illustrates the ways many diverse community and labor-based organizations, from across Lower Manhattan and beyond, allied with each other to press government agencies and officials at the federal, state, and local levels for a comprehensive emergency response to the environmental aftermath of the 9/11 attacks. Key lessons were learned in the following eight years of struggle. (These lessons are summarized at the end of the chapter.) Many affected groups united in the call for a federally funded **World Trade Center (WTC) Environmental Health Center (EHC)** to provide specialized health care for all residents, students, and area workers whose health was harmed by WTC exposures. In 2007, the groups formed the **Community Advisory Committee (CAC) to the WTC EHC** at New York City Health & Hospitals Corporation at Bellevue Hospital, which now has expanded to two additional clinics. It is the CAC's mission to draw on the expertise and experiences of its members to advise the WTC EHC and ensure that the evolving WTC-related health care needs of the affected communities are met, now and in the future. The CAC serves as a brain trust with a sophisticated real-world set of lessons learned that should inform a community advocacy framework for future disasters. This chapter illuminates the perspective of these community-based advocacy organizations.

Communication of information from government agencies is critical for residents, students, school parents, and office workers to help them understand the health risks of being exposed to the WTC toxic dust and smoke that pervaded the area surrounding the World Trade Center, indoors and out, after the disaster. 9/11 resulted in massive displacements, disruption of basic services, factory and small business closures, and job loss in Lower Manhattan, with ripple effects well beyond the area hit with the heaviest damage. Attempts to address the multiplicity of disaster-related needs of neighborhoods posed unprecedented challenges to those who lived and worked there, including community advocates and activists.

When residents, workers, parents, and advocates sought government help, they confronted an array of agencies on the federal, state, and local levels that had been tasked with a variety of disaster-related functions. Typically, agencies disavowed their disaster duties and passed the buck to other agencies. On the environmental health front, the Environmental Protection

## THE WORLD TRADE CENTER ENVIRONMENTAL HEALTH CENTER COMMUNITY ADVISORY COMMITTEE

The World Trade Center Environmental Health Center (WTC EHC) Community Advisory Committee (CAC) includes, but is not limited to, the following list of organizations:

- 105 Duane Street Residents
- 125 Cedar Street Residents
- 9/11 Environmental Action
- Beyond Ground Zero Network
- Civil Service Employees Association
- Communications Workers of America District 1
- Concerned Stuyvesant Community
- AFSCME District Council 37
- Ecuadorian International Center
- Good Old Lower East Side, Inc. (GOLES)
- Henry Street Settlement
- Lin Sing Association
- Independence Plaza North Tenants Association (IPN)
- Manhattan Community Board 1
- Manhattan Community Board 2
- Manhattan Community Board 3
- New York from the Ground Up
- New York Committee for Occupational Safety & Health (NYCOSH)
- New York State Public Employees Federation Division 199
- New York State Laborers' Union
- Organization of Staff Analysts (OSA)
- Rebuild.Downtown.Our.Town
- Rebuild with a Spotlight on the Poor
- South Bridge Tower Residents Coalition
- Stuyvesant High School Parents Association
- University Settlement
- World Trade Center Residents Coalition (WTCRC)

Agency (EPA) simply asserted, without evidence, that the air was safe, with Mayor Rudy Giuliani and other agencies following suit.<sup>1</sup>

In response to this failure of government to protect the public, the community and some labor-based organizations engaged in on-the-ground organizing efforts to compel the government to disclose the WTC hazards and to educate their affected constituencies about the dangers in the dust and smoke. For the first six months after 9/11, different groups framed a spectrum of different environmental health demands: WTC health care for those already experiencing symptoms; reparations for those whose health and ability to work would be permanently damaged; and a science-based effective cleanup of WTC contamination from people's homes, schools, and workplaces that would prevent further harm from chronic exposures, to name the most notable tasks.

Since 2003, these groups have advocated for the health of the affected communities. They have demanded corrective action from agencies still entrenched in denials of the health risks and later health impacts. The individuals and organizations that comprise the WTC EHC CAC have attempted to hold accountable, among others, the EPA, the Federal Emergency Management Administration (FEMA), the New York City Department of Health and Mental Hygiene (NYCDOHMH), the New York City Office of Emergency Management (NYCOEM), and the Lower Manhattan Development Corporation (LMDC). At times, even their best efforts were enough only to prevent the government or its agencies from acting with even greater negligence. However, WTC EHC CAC believe they have made important gains that construct a foundation for future efforts to improve the protections of the public in the event of disasters.

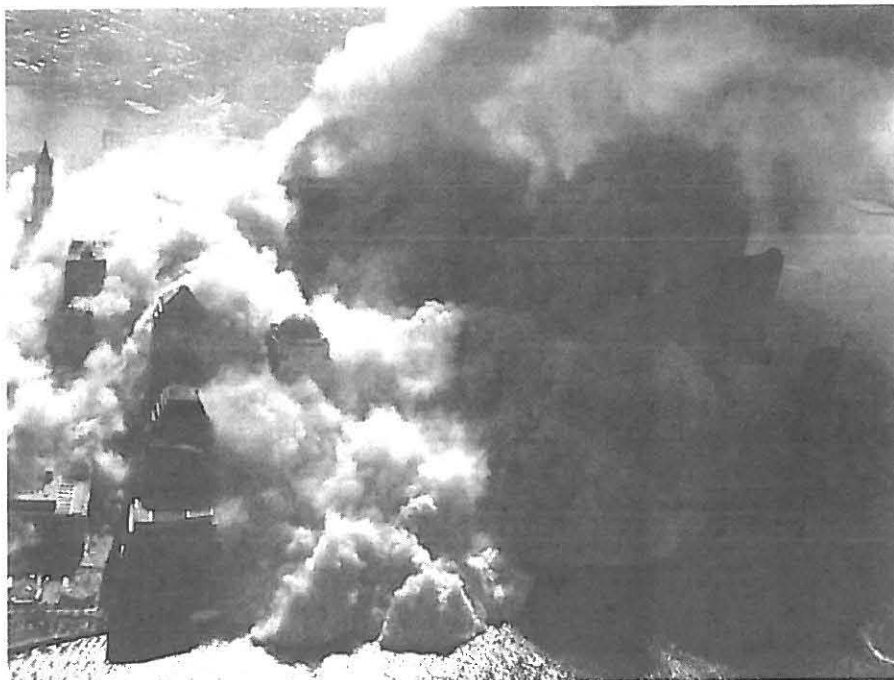
Early on, the community questioned the safety of the air quality indoors and outdoors and the adequacy of the government response. For many members of the CAC, the most productive partnership with a government agency has been work with WTC EHC. Provided following are snapshots of critical moments in their struggle. A more extensive timeline appears at the end of the chapter.

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## The Disaster

On September 11, 2001, terrorists attacked the United States by hijacking four airplanes and crashing two of them into the two 110-story World Trade Center towers, leading to the towers' collapse, destroying the WTC complex, killing nearly 2,800 individuals, and severely damaging many other skyscrapers. (See Figure 7.1.) Everything inside the WTC towers (thousands of computers containing lead and mercury; florescent lights containing mercury; and plastics of every kind, just to name a few materials) was broken apart and became part of the dust cloud that resulted from the towers' fall.

FIGURE 7.1 The World Trade Center disaster



Source: Reprinted with permission from the EPA.

Indeed, the destruction of the towers resulted in the unprecedented massive release of hundreds of tons of asbestos, fiberglass, lead, highly alkaline concrete dust, polycyclic aromatic hydrocarbons (PAHs), and many other toxic substances. The massive clouds from the collapse chased people down the streets, blocking out the sun and choking those caught in the clouds. Moreover, the dust infiltrated buildings over a wide geographic area, forcing tiny particulates at very high speed into every possible point of entry, including closed windows and ventilation systems. WTC debris traveled as far as Brooklyn and New Jersey, and WTC fires could be smelled there for months. The destruction would leave 16 acres of burning rubble, quickly named “the pile.” Ground Zero became the focal point for the cleanup and later the rescue; and cleanup workers were called “responders,” and those exposed to the dust as residents and workers in the area “survivors.”

In the absence of any agency-coordinated evacuation, downtown residents, office workers, and students were left to fend for themselves. While many fled the area, many others stayed in the immediate vicinity. Cellular communications failed first, followed by land lines, Internet, electricity, water, and gas. As early

as September 12, some residents and office workers were forced to return to indoor spaces that were virtual moonscapes, with heavy dust coatings on every surface. Many suffered eye and throat irritation, nosebleeds, and WTC cough. Fires burned and smoldered, releasing pollutants carried by the wind, creating a powerful odor that could be smelled for many miles. Chaos reigned. Access to basic services was disrupted.

Two days after 9/11, as residents confronted the environmental conditions in their homes and workplaces, ABC News reported, "Despite fires and a pungent odor at the wreckage of the World Trade Center, most tests for contaminants in New York's air have not triggered alarm, health officials say. U.S. Environmental Protection Agency spokeswoman said Wednesday that EPA officials 'really don't detect any real danger' in air and dust tests. And New York Mayor Rudolph Giuliani echoed the sentiments this morning. . . ."<sup>2</sup>

On September 18, then-EPA Administrator Christine Todd Whitman gave a White House-mandated assurance that the "air was safe to breathe." With these reassurances, people moved back to normal activities and were thus exposed to dangerous materials. Certainly, owners and tenants were forced back when federal and city agencies reopened contaminated buildings as insurance firms stopped payments to landlords, tenants, and residents. Some tenant-landlord struggles erupted in lawsuits when landlords sued tenants who moved out, often at the advice of their doctors and pediatricians. Local area vacancy rates exceeded 45%. Some Battery Park City-based residents formed the 9/11 Tenants Association, which later expanded to become the WTC Residents Coalition. The same process unfolded in other buildings to the north and east. For many months after 9/11, the 16 acres of WTC dust and debris was transported in loosely covered or open trucks and past several schools, then was dumped onto a hazardous debris barge in a residential area next to the air intakes for Stuyvesant High School. Fires continued to burn through March 2002; even after the major fires were out, smaller fires flared as debris removal exposed them to oxygen.

In early spring, groups of residents and school parents, beleaguered by their separate struggles with unresponsive agencies, began to recognize the need to pull affected constituencies together into a united front.

### **Snapshot 2002: WTC Environmental Summit**

On April 12, 2002, seven months after 9/11, as the EPA continued to resist demands that it address WTC contamination in indoor commercial and residential spaces, U.S. Rep. Jerrold Nadler (D-NY) released his "White Paper: Lower Manhattan Air Quality," calling on the EPA "to redeem itself and to make Lower Manhattan truly safe."

Shortly thereafter, representatives of WTC residents, tenants, and environmental and parent groups organized an environmental summit meeting to define a new, united approach to ridding their neighborhoods and schools of toxic contamination. After being briefed by Rep. Nadler and Hugh Kaufman, at that time the EPA's National Ombudsman's Office Chief Investigator, on the EPA's legal responsibilities under the National Contingency Plan—a blueprint for the federal government for responding to both oil spills and hazardous substance releases—more than forty organizations (including New York Committee for Occupational Safety & Health, Natural Resources Defense Council, and the WTC Residential Coalition) voted to abandon the strategy of fighting for landlord cleanup. Instead, they agreed to move forward together, demanding that the EPA take the lead role in a comprehensive indoor test and cleanup program for all affected areas.

This was followed shortly by a conference called “Beyond September 11—Environmental and Public Health Policy: A Working Conference” on May 9, 2002. It was organized by the New York Committee for Occupational Safety and Health (NYCOSH) and the City University of New York and was co-sponsored by thirty-eight grassroots organizations. More than 200 participants representing more than eighty labor, community, faith-based, environmental, immigrant, tenant, and public health organizations attended.<sup>3</sup>

Ironically, that evening, the Children's Allergy, Immunology and Respiratory (AIR) Foundation was honoring EPA Administrator Christie Todd Whitman for her commitment to asthma prevention with its Gift of Breath Award “for raising awareness of the environment as a possible first line of defense against asthma.” Outside the event, 9/11 Environmental Action held a protest attended by some fifty affected residents, school parents, and worker safety advocates from NYCOSH.

In the fall of 2001, the **Beyond Ground Zero (BGZ) Network** was formed from community-based organizations working together to address severe health and economic impact resulting from 9/11 on Lower Manhattan's low-income communities. In 2002, the National Mobilization Against Sweatshops (NMASS) and the Chinese Staff and Workers' Association (CSWA) partnered with the Asian American Legal Defense and Education Fund (AALDEF), the Commission of the Public's Health System (CPHS), and the Community Development Project of the Urban Justice Center (UJC). This network brought together a unique combination of legal and political, public health, participatory research experience, and worker's rights and compensation expertise.<sup>4</sup>

In 2002, BGZ began surveying their target population, which consisted of the immigrants and the poorest residents and workers in Chinatown and the Lower East Side. BGZ found that thousands of people were still coping with



health issues that resulted from 9/11 and that there was no access to health care or assistance. BGZ began to mobilize people on a larger scale to address unmet health care needs through a series of events. They organized two major town hall meetings in May 2002—one of which was attended by 2,000 people at PS 124 in Chinatown. These meetings led to BGZ's 7,000-person march from the Lower East Side to Foley Square in Chinatown on June 5, 2002. The fight for health care for residents and people affected by 9/11 was then taken to Washington, D.C. On July 31, 2002, BGZ sponsored the "March for Our Health, March for Our Lives" for which 1,000 people rallied.

Meanwhile, as a result of the advocacy of labor unions and some elected officials, in the spring of 2002 Congress provided initial limited funding for a one-time screening for responders under the WTC Worker and Volunteer Medical Screening Program, coordinated by the Mount Sinai Medical Center. At this time, however, there was still no recognition of need or funding for the WTC health needs of those living and working in the vicinity of Ground Zero and beyond.

### Snapshot 2003: EPA Inspector General Releases Reports

Near the two-year anniversary of 9/11, the U.S. EPA Office of Inspector General (OIG) released two reports that confirmed what many had suspected. The August 21, 2003, "Evaluation Report: EPA's Response to the World Trade Center Collapse: Challenges, Successes, and Areas for Improvement" concluded:

EPA's early public statements following the collapse of the WTC towers reassured the public regarding the safety of the air outside the Ground Zero area.<sup>1</sup> However, when EPA made a September 18 announcement that the air was "safe" to breathe, it did not have sufficient data and analyses to make such a blanket statement. At that time, air monitoring data was lacking for several pollutants of concern, including particulate matter and polychlorinated biphenyls (PCBs). Furthermore, The White House Council on Environmental Quality influenced, through the collaboration process, the information that EPA communicated to the public through its early press releases when it convinced EPA to add reassuring statements and delete cautionary ones. An EPA draft risk evaluation completed over a year after the attacks concluded that, after the first few days, ambient air levels were unlikely to cause short-term or long-term health effects to the general population. However, because of numerous uncertainties—including the extent of the public's exposure and lack of health-based benchmarks—a definitive answer to whether that the air was safe to breathe may not be settled for years to come.



A month later the EPA OIG released another evaluation report called the "Evaluation Report: Survey of Air Quality Information Related to the World Trade Center Collapse" on September 26, 2003.<sup>5</sup> This report found that "overall, the majority of respondents wanted more information regarding outdoor and indoor air quality, wanted this information in a more timely manner, and did not believe the information they received."

### Snapshot 2003–2004: Gains on Rebuilding Environmental Protections

With increased awareness about air quality after 9/11, the need to make Lower Manhattan livable, and with consistent public pressure at community board meetings and public hearings during the initial years of the rebuilding process, some gains were made on environmental protections.

In November 2001, a state-city authority called the **Lower Manhattan Development Corporation (LMDC)** was created to help in the planning and coordinating process of rebuilding Lower Manhattan. LMDC was funded through a community development block grant from the U.S. Department of Housing and Urban Development (HUD). In 2003, LMDC adopted an environmental framework for the rebuilding of the WTC site. It consisted of four components:

- (1) Green Design, Green Construction, and Sustainability Principles;
- (2) Construction of Environmental Protection Plan
- (3) Public Involvement and Government Entities Coordination Plan;
- (4) Baseline Assessment of Resources & Coordinated Cumulative Effects Analysis.<sup>6</sup>

As a result, every WTC office tower, Santiago Calatrava's WTC Transportation Hub (the design evokes the image of a bird in flight and will deliver natural light to the train platform 60 feet below), and the 9/11 Memorial & Museum were aiming for the Leadership in Energy and Environmental Design (LEED) gold rating. The U.S. Green Building Council has a building certificate program that encourages a sustainable building rating system that recognizes projects that implement best environmental and health performance. LEED professional credentials and exams are administered by a Green Building Certification Institute. LMDC is tracking the sustainability of the entire 16-acre WTC site, the largest commercial sustainable site in the country.

With increased public concern about air quality, it was necessary to reduce the impact of diesel engines during the rebuilding process. A private public initiative called the "7 WTC Diesel Emissions Reduction Project," with developer

Silverstein Properties working with their contractors to use less polluting ultra-low-sulfur diesel fuel (ULSD) and best available technology retrofits for off-road diesel construction equipment to reduce emission pollutants in 2002, was successful. This pilot study, along with the community, led to Local Law 77 Use of Ultra Low Sulfur Diesel Fuel by Nonroad Vehicles, which Mayor Michael Bloomberg signed into law on December 22, 2003. It extended ULSD use and retrofits to all of Lower Manhattan and public work contracts. This was a win-win for both the workers and the surrounding community.

With the support of business leaders and the community, a new state and city agency called the **Lower Manhattan Construction Command Center (LMCCC)** was created in November 2004. LMCCC was to coordinate the massive redevelopment of the WTC site and surrounding area, involving more than \$30 billion and consisting of sixty ongoing construction projects in less than one square mile in a short period of time by city, state, and federal agencies, private developers, and utilities. In addition, LMCCC was to oversee the implementation of the Environmental Performance Commitments (EPC), which include the oversight, monitoring, and mitigation of air, noise, and, vibration. At the request of Community Board 1, the air quality monitoring data was posted on a public access website in real time so that timely intervention could be made, if necessary. As a result of engineering controls in Lower Manhattan, the background levels of particulate matter (2.5 and 10) were below that of 9/11 using EPA's benchmark for National Air Quality Standards. The EPC framework could be considered for large-scale, complicated construction projects in dense urban environments.<sup>7</sup>

An example of community input in emergency response was the creation of the **Community Emergency Response Team (CERT)** in the summer of 2003 in Battery Park City (BPC), the area just west of the WTC site. The BPC CERT was formed as a direct result of 9/11 and its aftermath. It was the first CERT created on the east coast and in April 2005 was followed by the Tribeca CERT, which covered the area north of the WTC site. The community realized that after a major disaster such as 9/11, police, fire, and EMT workers were stretched to the breaking point. The BPC CERT drew from doctors, police, firefighters, and experienced CERT trainers to train local area residents in emergency rescue and medical care techniques. They were taught fire suppression, crowd control, search and rescue, and emergency medical treatment. A high percentage of the members undertook and were certified as Red Cross First Aiders. Later, sea search and rescue was added, with the addition of BPC's own rescue boat. A number of individuals from the group volunteered to help in the aftermath of Hurricane Katrina in New Orleans in 2005. CERT teams definitely have a role, but they need to be

cognizant of their abilities in complementing existing first responders during an emergency and knowing when to exit the area.

### **Snapshot 2004: Bellevue WTC Health Impacts Clinic and EPA WTC Expert Technical Review Panel**

Dr. Joan Reibman, NYU School of Medicine academic pulmonary physician at Bellevue Hospital Center, had worked with the NYS Department of Health on a WTC Residents Respiratory Health Study to assess the incidence of new-onset asthma and other respiratory symptoms after 9/11 and the persistence of symptoms. In May 2002, Asthma Moms organized the first Asthma Day in the WTC area. Dr. Reibman agreed to come into the streets to try to answer the medical questions of traumatized and sometimes angry community residents. Although BGZ had been meeting with Dr. Reibman over the years, BGZ, armed with the health survey data, reached out to Bellevue Hospital in 2004. Bellevue Hospital and the BGZ partnership worked to create the Bellevue WTC Health Impacts Clinic for BGZ residents and workers. This was the first program that treated nonresponders for WTC-related illnesses. A unique feature of the program was volunteers who did outreach through door-to-door surveys, town hall meetings, and the formation of a local community center. In 2005 BGZ and Bellevue were funded from the Red Cross September 11 Recovery Grant.<sup>4</sup>

In March 2004, Sen. Hillary Clinton of New York had forced the EPA to convene this scientific advisory panel to review EPA's response. The purpose of the panel was "to obtain greater input on ongoing efforts to monitor the situation for workers and residents impacted by the collapse of the World Trade Center. An expert technical review panel, convened by EPA, was formed to help facilitate the Agency's use of available exposure and health surveillance databases and registries to characterize any remaining exposures and risks, identify unmet public health needs, and recommend any steps to further minimize the risks associated with the aftermath of the World Trade Center attacks." Only after public pressure did the EPA include a community liaison as an ex-officio panel member. Although WTC community and labor representatives were meeting periodically, this twenty-one-month process formalized the World Trade Center Community Labor Coalition. It became a unified force that was much more powerful than its separate groups. Many of these groups now have representatives on the WTC EHC CAC.

After several panel meetings and public pressure, EPA allowed a labor representative in July 2004, in addition to the community liaison, to be seated on

the panel. One key community gain came that same day: the 125 Cedar Street Residents, whose building sits directly across the street from the heavily contaminated Deutsche Bank building, delivered a PowerPoint presentation, raising key concerns and emphasizing the need for EPA to exercise oversight of all aspects of the building's demolition. At that time, WTC damaged buildings could still be demolished without environmental oversight or appropriate precautions, as if no contamination was present.

EPA shut down the EPA WTC Expert Technical Panel after its twelfth meeting in December 13, 2005. This was after EPA released its final Test and Clean Program, which was underfunded and inadequate. This technically and scientifically flawed program would repeat the most serious limitations and deficiencies of the 2002 program as delineated by the inspector general. The deficiencies included defining a limited geographic area, not addressing buildings as an integrated system, omitting mechanical ventilation systems, and excluding workplaces, schools, small businesses, and firehouses. Although there was an original split at the beginning of the panel process in March 2004 between public-focused committee members and the scientific agency members, it eventually aligned against the EPA. The EPA again proceeded with its limited test program, which resulted in limited participation. Although the panel process was a frustrating one, it did provide enough public pressure that the EPA took a leadership role in the deconstruction of several large WTC-contaminated buildings, including 130 Liberty Street (Deutsche Bank) in December 2004.

The community labor presentation requested that the EPA follow the "Precautionary Principle" during the EPA WTC Expert Technical Panel Process (2004): If the precautionary principle was initially followed, much of the exposure of the WTC toxins could have been limited and the first responders and community could have taken the necessary precautions, which would have limited liability, medical, and legal costs.

### **Snapshot 2006: WTC Bellevue Environmental Health Center Announced**

Public pressure for health care for the WTC residents, students, and office workers who were affected by 9/11 was mounting as the five-year anniversary approached. One public town hall event and an announcement by Mayor Bloomberg marked a major turning point in the recognition of 9/11 health impacts to the community. On September 5, 2006, Mayor Bloomberg and Health and Hospitals Corporation President Alan Aviles announced the establishment of the WTC Environmental Health Center at Bellevue

Hospital Center. It would expand medical and mental health treatment to nonresponders exposed to the toxic dust and fumes at the WTC. This timely financial commitment was critical, since the private Red Cross funding for the limited WTC-related health services for the BGZ community was coming to an end in 2006. It had taken five years for the first public funds to be allocated to provide outreach and treat residents, office workers, students, and other affected people. Since then, the WTC EHC expanded to Gouverneur and Elmhurst Hospitals.

The following day, on September 6, 2006, 9/11 Environmental Action sponsored a town hall forum: "Affected but Neglected: the Impact of 9/11 on Community Health and a Call for Federal Action." More than 300 residents, office workers, parents, and students filled St. Paul's Chapel, located across the street from the WTC site. Findings were presented by doctors from the two centers for excellence (Bellevue and Mount Sinai, respectively) that treated both nonresponder and responder populations and by the New York Committee on Occupational Safety and Health. The moderator was Juan Gonzalez, who more than any other reporter had written early on about WTC air quality and 9/11 health impacts for the *New York Daily News*. Still, after five years, many people had questions. Consequently, after the formal presentations, there was a very long line at the microphone to ask questions of the medical and scientific experts.

### Snapshot 2009: Community Advisory Committee

The Community Advisory Committee (CAC) of the WTC EHC of the New York City Health and Hospitals Corporation (HHC) developed out of the fluid collaborative process over the years to tackle environmental health issues arising after 9/11. The CAC illustrated how community collaboration can play a major role in developing and delivering effective medical services to diverse populations, often requiring unique outreach in numerous languages, from Chinese to Polish. In addition, the CAC has taken an integral role in advising WTC EHC scientists on proposed research of WTC environmental health impacts to the community. The WTC EHC CAC has operated on the community-based participatory research model and has shown what genuine partnership can accomplish—unlike the community's long experience in the EPA WTC Expert Technical Panel Process. The WTC EHC CAC is an arena for direct, meaningful input on the part of the participating organizations and individual members. For example, as it became apparent that children were suffering from serious and lasting WTC health

consequences, the community began to press for a pediatric division at the WTC EHC. In October 2007, it was announced that a pediatrician would join the Bellevue clinic staff.

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## Summary and Lessons Learned

We present here a short list of lessons learned of interest not only to environmental advocates, but also to policymakers.

1. *Push for prevention first.* The first rule of environmental health is to prevent further harm by preventing further exposures. Government health and environmental authorities must issue proper risk communications, must provide the proper safety equipment, such as respirators, and must enforce their use. In the case of the WTC disaster, EPA should have conducted representative testing and comprehensive cleanup, indoors and out, in all affected neighborhoods, as prescribed by the National Contingency Plan.
2. *Apply the "Precautionary Principle."* This means that the public should be protected from harm when there is plausible risk, although a direct relationship between cause and effect may not be definitively concluded, and that decision-making process be democratic and include the potentially affected party. For example, in the WTC environmental disaster, where emerging illnesses were not instantaneous, the burden of proof should fall on the party advocating an action—or in this case, inaction—instead of the exposed community. The community called upon the EPA to follow the Precautionary Principle during the EPA WTC Expert Technical Panel Process (2004).
3. *Recognize and support the public's right-to-know.* Environmental struggles are often first and foremost battles over the truth about health risks. The community's first step is to press for the public release of all relevant data and information.
4. *Recognize and support the public's right to have input.* The community has a right to have meaningful input into the formulation of government policies that affect the public's health. An open, transparent public process is the foundation for community involvement and input and the appropriate arena for community engagement at every stage in environmental health decision making—from designing studies, to designing testing, cleanup or mitigation programs, to planning and preparedness for disasters. Public process can also serve as the "court of public opinion," especially when the media are

present, and thus can be an effective means to educate and mobilize the broader public.

5. *Educate for engagement.* Although most students are required to take a civics class sometime in the course of their education, the real nuts and bolts of civic engagement are not taught. Consumer advocate Ralph Nader, who pioneered the Freedom of Information Act, was right to call for a “university requirement of civil practice aimed at bolstering the ability of ordinary citizens to protect and advance their interests.” Nader has observed that although universities excel at the production of knowledge, they lag when it comes to putting it into practice.<sup>3</sup> It is not enough for people to know their rights; they also need to understand how the wheels of government turn, and especially how the community can gain traction for its demands. Much of the success of the community has relied on its ability to seize every opportunity for civic engagement, whether that was with the community boards, the New York City Council, the EPA WTC Expert Technical Panel, or the affected community representatives to the U.S. Congress. Institutionalized resistance to community calls for more protective policies exist at every level of government.

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## Key Terms

Beyond Ground Zero (BGZ)  
Network

Community Advisory Committee (CAC)  
to the WTC EHC

Community Emergency Response  
Team (CERT)

Lower Manhattan Construction Command  
Center (LMCCC)

Lower Manhattan Development  
Corporation (LMDC)

World Trade Center (WTC) Environmental  
Health Center (EHC)

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## Discussion Questions

1. Summarize the role played by community groups in advocating for environmental protections after 9/11.
2. Summarize the government response to post-9/11 health risks.
3. Summarize the lessons learned about community groups and their ability to advocate for environmental health protections.



## WTC ENVIRONMENTAL HEALTH HISTORY TIMELINE

### 2001

September 11: Terrorists hijacked two airplanes (American Airlines Flight 11 and United Airlines Flight 175) and attacked the United States by crashing them into the World Trade Center (WTC) Towers 1 and 2, leading to their collapse and destruction of the WTC complex (including WTC Tower 7), killing nearly 2,800 individuals, and severely damaging many other skyscrapers.

September 14: "OSHA, EPA, Update Asbestos Data. Continue to reassure public of contamination fears . . . The U.S. Environmental Protection Agency and the Department of Labor's Occupational Safety and Health Administration today announced that the majority of air and dust samples monitored in New York's financial district do not indicate levels of concern for asbestos. The new samples confirm previous reports that ambient air quality meets OSHA standards and consequently is not a case for public concern. New OSHA data also indicates that indoor air quality in downtown buildings will meet standards."<sup>1,3</sup>

Initial days after 9/11: International Union of Operating Engineers and Transport Workers Union Local 100 began to test the air at Ground Zero and many unions (including AFSCME District Council 37, TWU Local 100, Public Employee Federation, Civil Service Employees Association, Communications Workers of America, Association of Legal Aid Attorneys, Professional Staff Congress) working in buildings in Lower Manhattan to determine what their members might be exposed to; NYCOSH worked closely with the unions and community, immigrant and tenant organizations and issued the first WTC fact sheets and conducted outdoor and indoor sampling; Tenant groups (BPC, Independence Plaza North, 105 Duane Street, and 125 Cedar Street) and parent associations at seven neighboring public schools began to organize around environmental health issues.

September 17: The New York Stock Exchange on Wall Street reopened for first time after 9/11 after being closed for four business days; NYCDOH responds to the WTC disaster with "Recommendations for People Re-Occupying Commercial Buildings and Residents Re-Entering Their Homes" . . . "How should I clean the dust in my apartment when I move back in? The best way to remove dust is to use a wet rag or wet mop. Sweeping with a dry broom is not recommended because it can make dust airborne again. Where dust is thick, you can directly wet the dust with water, and remove it with wet rags and mops."

October 11: First Community Forum on 9/11 Health took place at PACE University.

October: NYCOSH meetings foster first discussion among diverse labor unions of health consequences of WTC environmental exposures.

Fall: Beyond Ground Zero (BGZ) Network was formed.

December 18: "Residents Rally Over Air Quality in Lower Manhattan . . . More than 100 downtown residents gathered on the steps of City Hall Tuesday

night to protest what they say is unsafe air quality in Lower Manhattan. Many of the protesters say the air downtown is still making residents, students, and workers sick. They want city officials to relocate the removal of debris away from large housing complexes . . . ."<sup>3</sup>

## 2002

January 24: "Some Concerns Remain as High Schools Closest to Ground Zero Prepare to Reopen."<sup>3</sup>

January 25: "Parents concerned about the conditions of an elementary school just blocks from Ground Zero were in court Friday. School officials insist PS 89 is safe, but parents aren't ready to take their word for it."<sup>5</sup>

April 12: U.S. Rep. Jerrold Nadler released white paper, "Lower Manhattan Air Quality."

April 20: Environmental Health Summit with Lower Manhattan community, tenant, environmental, and school groups and Rep. Jerrold Nadler agreed to demand that EPA perform a comprehensive sampling and cleanup.

Spring: Congress agreed to provide initial limited funding for the WTC Worker and Volunteer Medical Screening Program, based initially at Mount Sinai Medical Center (later growing to five additional clinics) after much union campaigning.<sup>1</sup>

May 7: First Mobile Asthma Program for Annual World Asthma Day for NYC WTC Downtown Residents and Workers sponsored by Asthma Moms, Bellevue Hospital Center-Asthma Clinic, NYU, and American Lung Association of New York.

May 8: EPA to clean WTC apartments to "reassure" residents after much public pressure; a reversal of EPA's earlier position that EPA is not responsible for indoor conditions that resulted from 9/11; 9/11EA and NYCOSH met with EPA to try to strengthen the limited program with little success.

May 9: NYCOSH/City University of New York conference "Beyond September 11: Environmental and Public Health Policy, A Working Conference" co-sponsored by thirty-eight grassroots organizations and attended by more than 200 participants representing labor, community, faith-based, environmental, and public health organizations.

May 5 and 19: Major town hall meetings called by BGZ; included 2,000 people in PS 124 in Chinatown to mobilize people to address unmet health care needs.

June 5: Major march with about 7,000 people from the Lower East Side to Foley Square, Chinatown organized by BGZ.

July 31: 1,000 people rallied in Washington, D.C. for "March for Our Health, March for Our Lives" sponsored by BGZ for health care for residents and people affected by 9/11.

July: EPA began cleanup "pilot program in an unoccupied building at 110 Liberty St. to test eight techniques for removing indoor dust and debris. Air and dust will be tested for a wide range of pollutants before and after the cleaning."<sup>8</sup>

July: WTC Health Registry created by Agency for Toxic Substances and Disease Registry and NYCDOH to monitor the health of those directly exposed to the WTC disaster; initial funds from FEMA.

## 2003

March 26: The New York City Department of Environmental Protection (DEP) completed work removing the dust and debris that accumulated on the roofs, windows, and facades of downtown buildings following the WTC collapse. At the project's close, DEP crews had cleaned the exteriors of 221 buildings, totaling more than 3.6 million square feet.

May 6: Second Annual World Asthma Day for NYC WTC Downtown Residents and Workers held in Tribeca and Chinatown; participants included Asthma Moms, NYU, Bellevue Hospital Center Asthma Clinic, American Lung Association of New York, and AALDEF.

September 23: Environmental Protection Agency, Office of Inspector General releases "Evaluation Report: Survey of Air Quality Information Related to the World Trade Center Collapse": "Overall, the majority of respondents wanted more information regarding outdoor and indoor air quality, in a timely manner, and did not believe the information they received. The survey results suggest disconnect between government statements about air quality and respondents' perceptions of possible health risks from breathing the air in Lower Manhattan. The majority of respondents reported that they thought breathing outdoor and indoor air in Lower Manhattan in the weeks following the WTC collapse could expose them to short- and long-term health effects. Further, data indicated that contamination from the collapse of the WTC towers spread into the homes of respondents located beyond the perimeter of the zone designated as eligible for the EPA-led testing and cleaning program."<sup>5</sup>

December 15: New York City Council approves bill to curb diesel emissions, which makes NYC a national leader in fight against environmental triggers of asthma.

## 2004

March 10: Lawsuit (*Benzman v. Whitman*) filed by Lower Manhattan residents, office workers, business owners, parents, and students against Christie Todd Whitman (head of EPA on 9/11) and the EPA for issuing false safety assurances and failing to comply with the federally mandated requirement to clean up buildings contaminated by the 9/11 terrorist attacks.

March 24: "Gold Standard" for Remediation of WTC Contaminations published.<sup>8</sup>

March 31: First meeting held of the WTC Expert Technical Review Panel: "To obtain greater input on ongoing efforts to monitor the situation for workers and residents impacted by the collapse of the World Trade Center, an expert technical review panel, convened by EPA, was formed to help facilitate the

Agency's use of available exposure and health surveillance databases and registries to characterize any remaining exposures and risks, identify unmet public health needs, and recommend any steps to further minimize the risks associated with the aftermath of the World Trade Center attacks." After pressure, the panel included a community liaison as an ex-officio panel member.<sup>9</sup> Although WTC community and labor representatives were meeting periodically, this panel process formalized the World Trade Center Community Labor Coalition.

May 18: Manhattan Community Board 1 (CB1) unanimously passed resolution on the WTC Memorial and Redevelopment Plan Final Generic Environmental Impacts Statement reiterating its concern about the cumulative impact (including air quality) of the various redevelopment and reconstruction projects and request a Lower Manhattan Construction Coordination Group.

July 26: EPA WTC Expert Technical Review Panel was allowed to include a labor representative in addition to the community liaison to be on the panel and present; 125 Cedar Street Residents presented "Environmental Concerns Raised by the Deutschebank Demolition."

September 8: General Accountability Office (GAO) released report "September 11 Health Effects in the Aftermath of the World Trade Center Attack"; describes continuing health impact based on evidence that thousands of people involved in rescue, recovery, cleanup, as well as those who lived and worked in the WTC vicinity.<sup>10</sup>

October 19: CB1 unanimously passed resolution calling upon the EPA to publicly commit itself to seven principles—including that EPA will conduct with appropriate input from the community, comprehensive indoor environmental testing for multiple contaminant for both residences and workplaces, and include mechanical ventilation systems; subsequently passed.

December: EPA took leadership role in the deconstruction of several large WTC contaminated buildings, including 130 Liberty Street (Deutsche Bank).

## **2005**

January: Demolition of first WTC contaminated building (4 Albany) under EPA oversight began.

November 29: EPA released a final Test and Clean Program that was underfunded, inadequate, and technically and scientifically flawed and repeated the most serious limitations and deficiencies of the 2002 program as delineated by the inspector general—including reverting to the limited geographic area and excluding workplaces, schools, small businesses, and firehouses and not addressing buildings as an integrated system and omitting mechanical ventilation systems.

December 13: Twelfth and final WTC Expert Technical Review Panel; EPA disbanded panel. EPA to clean apartments although second plan rejected by residents and panel members.

## 2006

February 2: Federal District Court Judge Deborah Batts issued a ruling allowing *Benzman v. Whitman*, the lawsuit filed by Lower Manhattan residents, office workers, business owners, parents, and students against Christie Todd Whitman and the EPA, to proceed on the grounds, noting that "no reasonable person would have thought that telling thousands of people that it was safe to return to lower Manhattan, while knowing that such return could pose long-term health risks and other dire consequences, was conduct sanctioned by our laws."

February: New York congressional delegation convinced Bush administrator to appoint Dr. John Howard, director of the National Institute for Occupational Safety and Health (NIOSH), as 9/11 Health Coordinator; CB1 passed resolution strongly supporting the bipartisan call for the appointment of a September 11 Federal Health Czar to coordinate the federal government's response to short- and long-term adverse health effects resulting from 9/11.

April 6: More human remains found near WTC: 74 bone fragments found on roof of 130 Liberty Street, which is to be demolished.

April 7: Centers for Disease Control and Prevention released report detailing widespread prevalence of respiratory and psychological illness among survivors; Rep. Nadler states, "The study confirms what community leaders and medical professionals have asserted for years that the World Trade Center dust poses a grave and long-term threat to public health."

April: Rank-and-file activists and local officers formed the 90 Church Street Labor Coalition to ensure comprehensive remediation and future safety. The coalition fought for three major health and safety improvements: well-sealed double windows; an above standard HVAC filtration system; and a regular program of air testing. The coalition had a major health and safety victory after a rigorous two-year campaign, when agency managements agreed to install interior windows throughout a building located across from the WTC that was severely contaminated on 9/11. 90 Church Street housed more than 2,000 employees of the U.S. Postal Service and the New York City Housing Authority. On 9/11, 90 Church Street was breached, fires were started, and the sprinkler system discharged. Toxic substances, including lead, asbestos, mercury, dioxin, and mold, permeated the building. It took nearly three years to resolve insurance disputes and decontaminate and renovate the building. Almost everything within 90 Church Street, except for major structural elements and some Sheetrock, had to be discarded. Returning federal and city workers united with incoming state

workers in an unprecedented health and safety campaign. After a long campaign and extensive negotiations by CSEA and PEF representatives, interior windows were installed on all state (Department of Health and Department of Public Service) floors (4, 13, 14, 15) before they moved to 90 Church Street in early 2005. They then worked cooperatively with federal workers to obtain the same windows for New York City Housing Authority and U.S. Postal Service workers in the building. The coalition credits its success to union solidarity enhanced by the support of community health and safety and environmental organizations (including NYCOSH, 9/11 EA, CB1, and the Sierra Club) and assistance from elected officials. The windows were completely installed by the end of 2006/early 2007. There is no more powerful weapon in the labor arsenal than real solidarity.

August: NYCDOHMH released first "Clinical Guidelines for Adults Exposed to the World Trade Center Disaster."<sup>11</sup>

September 5: Mayor Bloomberg and HHC President Aviles announced establishment and January 2007 opening of the WTC Environmental Health Center at Bellevue Hospital Center.

September 6: Town hall forum held on the impact of 9/11 on community health and a call for federal action, St. Paul's Chapel.

September 8: "World Trade Center Will Be Green" press conference announced that WTC site will be built to a standard 20% more efficient than the New York Energy Conservation Construction Code.

October 22: Workers uncovered more remains at WTC in manholes and utility areas that were overlooked in previous years.

## **2007**

January 3: More human remains were found—tiny fragments about 1 to 2 inches long, in addition to four other bones, and more than 200 other remains since October 2006—were found during excavation of a street-level service road at Ground Zero.

January 11: New York City Council held hearing on U.S. EPA's Cleanup of WTC Dust Contamination in Residences and Offices in Lower Manhattan, specifically EPA's December 2006 Test and Clean Program.

April 17: CB1 unanimously passed a resolution calling on NYCDOHMH to develop WTC physical and mental health guidelines for children who lived or attended school in the WTC area (more than 25,000 on 9/11).

June 20: "World Trade Center: Preliminary Observations on EPA's Second Program—Statement of John B. Stephenson, Director Natural Resources and Environment to Address Indoor Contamination." . . . "EPA has taken some actions to incorporate recommendations from the Inspector General and expert panel members into its second program, but its decision not to



incorporate other recommendations may limit the overall effectiveness of this program."

August 18: Tragic seven-alarm high-rise fire at 130 Liberty Street (Deutsche Bank) killed two firefighters, Robert Beddia and Joseph Graffagnino.

September: "World Trade Center: EPA's Most Recent Test and Clean Program Raises Concerns That Need to Be Addressed to Better Prepare for Indoor Contamination Following Disasters—Report to Congressional Requesters" released by U.S. Government Accountability Office.<sup>12,13</sup>

September: 9/11 health care vigils conducted by many Lower Manhattan organizations at Foley Square, Chinatown.

## 2008

February 21: Manhattan Borough President Scott Stringer announced the creation of the Manhattan Borough Construction Watch in response to several tragic construction accidents, including the 130 Liberty Street fire.

April 13: 9/11 Health forum on continuing health problems were organized by many coalitions including BGZ & 9/11 EA.

April 22: Second Circuit Court of Appeals hearing *Benzman v. Whitman* issued its decision rejecting efforts to hold Christine Todd Whitman, and by extension any government official, personally liable for false safety assurances about Lower Manhattan's air quality in the days after 9/11, thus setting a dangerous precedent for future disasters.

June 20: WTC Health Registry study showed importance to continue tracking 9/11-related pediatric health effects; still no pediatric guidelines have been released by NYCDOH.<sup>14</sup>

July: U.S. EPA released "Breathing Clean by Building Green: Clean Diesel Construction" video, which highlights retrofit technologies that have been used in significant projects such as in Lower Manhattan to reduce diesel emissions from construction equipment to protect public health when organizations collaborate.

July: New York City Construction, Demolition & Abatement Working Group released "Strengthening the Safety, Oversight and Coordination of Construction, Demolition and Abatement Operations: Report and Recommendations to Mayor Michael R. Bloomberg" in response to the August 18, 2007, tragic fire at 130 Liberty Street; it strengthened interagency practices between the Department of Buildings (DOB), Fire Department of New York (FDNY), and Department of Environmental Protection (DEP).

July: Bush administration alerted Dr. Howard that he would not be reappointed to a second term as the federal government's 9/11 health coordinator, although he had earned the respect of government, labor, and community leaders.

September: World Trade Center Medical Working Group of New York City released "2008 Annual Report on 9/11 Health." . . . "More than 40,000 rescue and recovery workers have been screened nationally, primarily at New



York City's three WTC Centers of Excellence. Of these, more than 10,500 have received federally funded treatment for physical health conditions including respiratory problems, asthma and gastroesophageal reflux disease, and more than 5,500 have been treated for mental health conditions such as post-traumatic stress disorder (thousands of others have been treated with private funding). In addition, nearly 2,700 Lower Manhattan residents and area workers—including those who worked in Lower Manhattan, though they may live elsewhere—have sought treatment for these same conditions from New York City's Health and Hospitals Corporation. Some of these people have recovered, but others have not."

September 7: 9/11 health care vigils conducted by many Lower Manhattan organizations at Foley Square, Chinatown.

October 2: WTC EHC received its first federal funding (\$30 million over the next three years) for screening, monitoring, and treatment of Lower Manhattan area workers, residents, and students.

December 4: Mayor Bloomberg announced launch of the Notify NYC pilot program to deliver emergency public information by e-mail, text messages, and reverse-911 alerts in four New York City community districts, including Lower Manhattan, which strongly advocated for its creation.

December 22: Manhattan District Attorney Robert M. Morgenthau announces 130 Liberty Street indictments (Deutsche Bank Building): "But the work has been protracted, tortuous, deadly and—it now seems—criminally negligent . . . manslaughter charges were filed against three construction supervisors and the John Galt Corporation, saying, 'Everybody who could have screwed up, screwed up here.' Galt, virtually a shell corporation, was in charge of the demolition on Aug. 18, 2007, when two firefighters were killed and two more injured in a fire at the building. Though New York City was not named in the indictment, the Bloomberg administration acknowledged 'the failures of our agencies to inspect and detect the conditions that contributed to the deaths.'"

## 2009

January 23: Medical examiner attributes second sarcoidosis-related death to WTC collapse: Leon Heyward, an investigator for Department of Consumer Affairs, was working in Lower Manhattan on 9/11. More cases of sarcoidosis and granulomatous lung disease have now been reported among those exposed to World Trade Center dust.

February 24: New York congressional delegation, labor union leaders, 9/11 responders, and Lower Manhattan residents urged reappointment of Federal 9/11 health coordinator, Dr. John Howard.

February 24: CB1 unanimously passed resolution expressing its dismay that NYC-DOHMH has yet to provide health guidelines to assist in the diagnosis and treatment of children and adolescents exposed to the World Trade Center disaster.

March 11: House investigative report found that officials from the Agency for Toxic Substances and Disease Registry (ATSDR) "deny, delay, minimize, trivialize or ignore legitimate health concerns."<sup>15</sup> Although this report was not about 9/11, it should be noted that ATSDR is responsible for protecting the public near toxic sites which some consider the 9/11 WTC site fell in.

### **2010-2011**

James Zadroga 9/11 Health and Compensation Act of 2010 passed, funded, and contracts awarded for clinical and data coordinating centers for WTC Environmental Health Center (Bellevue), New York University, Mt. Sinai, Queens College, and the Fire Department of New York (FDNY). Research contracts were awarded to study distal airways disease at New York University, cardiovascular disease at Mt. Sinai, and cancer at FDNY

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We thank those public servants who represented our district: Congressman Jerrold Nadler and his chief of staff Amy Rutkin, New York State Assembly Member Linda B. Rosenthal; former New York Sen. Hillary Rodham Clinton and staff Chris Falvo; and Case Button; New York Sen. Charles Schumer; Congresswoman Carolyn Maloney; New York State Speaker Sheldon Silver; Manhattan Borough President Scott Stringer, who appoints the members of all Manhattan Community Boards (including 1, 2, and 3, which are the closest to the WTC site); former New York City Council Member Alan Gerson; EPA National Ombudsman Robert J. Martin and EPA Chief Investigator Hugh Kaufman; and Dr. John Howard. In addition, we thank the media that documented the past 7 1/2 years: *Downtown Express* (editor Josh Rogers, Julie Shapiro, Rhonda Kaysen, and Elizabeth O'Brien); the *TribecaTrib* (editor Carl Glassman and Etta Sanders), the *Battery Park Broadsheet* (Robert Simko); and the *New York Daily News* (Greg Smith and Juan Gonzalez). Special thanks to Micki Siegel de Hernandez, Dave Newman, Rob Spencer, Stan Mark, Paul Stein, Paul Bartlett, Jo Polett, and Kathleen Moore.

# **ENVIRONMENTAL POLICY AND PUBLIC HEALTH**

## **Air Pollution, Global Climate Change, and Wilderness**

**WILLIAM N. ROM**

**FOREWORD BY FRANCES BEINECKE**



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