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Sent: Monday, August 01, 2011 5:01 PM

To: FASAB

Subject: Comments to Extended Deferral of the Effective Date of Technical Bulletin 2006-1, Recognition and Measurement of Asbestos-Related Cleanup Costs

Enclosed are the Defense Logistics Agency's (DLA) comments to the "Extended Deferral of the Effective Date of Technical Bulletin 2006-1, Recognition and Measurement of Asbestos-Related Cleanup Costs (Technical Bulletin 2011-2)":

Question for Respondents: Do you agree or disagree with the proposed additional one-year deferral of Technical Bulletin 2006-1? The new effective date would be for reporting period beginning after September 30, 2012. Please explain the reasons for your position in as much detail as possible.

DLA concurs with the deferral. However, it shouldn't impact the methodology and approach DLA plans to use to address this requirement.

An additional comment to Technical Bulletin 2006-1: In order to be an environmental liability (EL), there must be a regulatory driver. The only regulatory driver for asbestos is friability. As it is an imminent safety hazard, friable asbestos requires cleanup immediately. Since the cleanup must be done immediately, it would not cross fiscal years.

Based upon the definition, it would not be an EL. Non-friable asbestos has no regulatory driver and therefore, it is not an EL. Please clarify and provide clear guidance how asbestos is an EL.

If you have any questions, please let me know.

Thanks, Nanette

Nanette Chevrier Werner

Environmental Restoration Division Chief Environmental Management DLA Installation Support