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Asbestos Disease Awareness Organization™
Voice of the Victims

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March 30, 2020

Administrator Andrew Wheeler
U.S. Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Extension of Public Comment Period/Postponement of SACC Meeting for Asbestos Risk Evaluation

Dear Administrator Wheeler,

As the President of the Asbestos Disease Awareness Association (ADAO), and Chairs of its Science Advisory Board (SAB) and Prevention Advisory Board (PAB), we are writing to express deep concern that EPA will put in place a rushed and inadequate public comment and peer review process for its draft risk evaluation on asbestos under the Toxic Substances Control Act (TSCA).

You have indicated that EPA will soon release the draft asbestos evaluation. If EPA follows the same process it has used for previous evaluations, its Science Advisory Committee on Chemicals (SACC) will meet to review the draft 30 days after its release. To provide informed feedback to the SACC, scientific experts and members of the public will have a few short weeks to review the draft and prepare comments for consideration at the SACC meeting.

Even under normal circumstances, this schedule would be extremely challenging. Asbestos is a very hazardous substance with a large body of scientific literature. EPA and other regulatory bodies have relied on previous assessments to set exposure limits and adopt other measures to protect workers and the public. Any change in how the asbestos database is assessed would have public health implications that extend well beyond TSCA. An evaluation that is not adequately protective could result in an increase in asbestos-related disease and death. It will thus be essential for leading asbestos experts from the scientific and medical communities to carefully examine EPA's findings and supporting analyses. If the draft evaluation is flawed scientifically, these experts must have enough time to identify these flaws and explain them to the SACC and EPA staff.

This task will be immeasurably more difficult because of the global coronavirus pandemic and the extraordinary stresses it is placing on the US health care system and economy. Many leading asbestos experts are medical doctors who are overwhelmed with supporting their colleagues and caring for patients as virus cases mount and hospitals struggle with shortages of beds and medical equipment. University faculty who are asbestos specialists are consumed with the challenges of on-line instruction, safeguarding threatened research programs, and coping with personal and family disruption caused by school closures and the loss of essential services.

Asbestos Disease Awareness Organization is a registered 501(c) (3) nonprofit organization
"United for Asbestos Disease Awareness, Education, Advocacy, and Community Support"
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These experts will have limited time and attention to devote to the draft EPA evaluation and some will be unable to review it at all. This will be the case for SACC members as well, some of whom are physicians whose medical responsibilities will make it impossible to play a meaningful role in SACC virtual meetings.

The asbestos risk evaluation is simply too important for EPA to proceed without the informed and thoughtful participation of leading asbestos experts. Yet this will be the consequence of a rushed process that ignores the coronavirus pandemic and imposes an impossible timetable on overstressed scientists and SACC members.

We ask that EPA put SACC review and public comment on hold until the current crisis is resolved and the scientific and medical community can give the draft evaluation the time and attention it deserves.

Sincerely yours,

Linda Reinstein
ADAO President

Arthur L. Frank, MD, PhD
ADAO Science Advisory Board Co-Chair

Richard Lemen, PhD, MSPH
ADAO Science Advisory Board Co-Chair

Brent Kynoch
ADAO Prevention Advisory Board Chair

cc: Assistant Administrator Alexandra Dunn
David Fischer
Joseph Cole, Esq.
Tala Henry

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