Message

From: Beck, Nancy [Beck.Nancy@epa.gov]
Sent: 11/9/2018 9:38:35 PM
To: Linda Reinstein [linda.reinstein@gmail.com]
CC: Morris, Jeff [Morris.Jeff@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Henry, Tala [Henry.Tala@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Fehrenbacher, Cathy [Fehrenbacher.Cathy@epa.gov]; Vendinello, Lynn [Vendinello.Lynn@epa.gov]; Barone, Stan [Barone.Stan@epa.gov]
Subject: RE: Peer Review Panel for Draft Asbestos Risk Evaluation (EPA-HQ-OPPT-2018-0605)

Linda,
Thank you for your letter. We appreciate your thoughtful input. As I'm sure you are aware, consistent with our FACA process, we will be seeking public comment on all the names of individuals that have been nominated to serve as ad hoc reviewers on the SACC.

Regards,
Nancy

Nancy B. Beck, Ph.D., DABT
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From: Linda Reinstein [mailto:linda.reinstein@gmail.com]
Sent: Monday, November 5, 2018 8:42 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Morris, Jeff <Morris.Jeff@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>; Fehrenbacher, Cathy <Fehrenbacher.Cathy@epa.gov>; Vendinello, Lynn <Vendinello.Lynn@epa.gov>; Barone, Stan <Barone.Stan@epa.gov>
Subject: RE: Peer Review Panel for Draft Asbestos Risk Evaluation (EPA-HQ-OPPT-2018-0605)

FORMAL LETTER ATTACHED

Dr. Nancy Beck
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Peer Review Panel for Draft Asbestos Risk Evaluation (EPA-HQ-OPPT-2018-0605)

Dear Dr. Beck:

Founded in 2004, the Asbestos Disease Awareness Association (ADAO), an independent 504(c)(3) non-profit organization, has spent over a decade working to prevent asbestos-caused diseases. ADAO works nationally and internationally with the leading scientists, medical doctors, industrial hygiene specialists, legislators, and community advocates to protect public health and our environment. As a recognized leader in asbestos education, ADAO hosts an annual international academic conference, now in its 15th year, to promote scientific advances in the treatment and cure of asbestos related disease and advocate for the elimination of all asbestos exposures throughout the world.

As you know, asbestos is one of the 10 substances on which EPA is conducting initial risk evaluations under the amended

Toxic Substances Control Act (TSCA). ADAO is closely following the progress of the asbestos risk evaluation and commented on both the 2017 scoping document and the 2018 problem formulation.

We believe that a robust public comment and peer review process is essential for the credibility and scientific validity of the asbestos evaluation. In their October 30, 2018 letter to Acting Administrator Wheeler, Safer Chemicals Healthy Families (SCHF) and other groups recommended several minimum steps that this process must include. ADAO supports these constructive and thoughtful recommendations.

As SCHF indicates in its letter, the Scientific Advisory Committee on Chemicals (SACC) can provide an umbrella for reviewing these evaluations but there are certain chemicals for which a separate review panel of qualified experts is essential to assure that the Agency receives informed and knowledgeable feedback.

Asbestos is one of these chemicals. Several cancer and non-cancer effects are uniquely linked to asbestos fibers, including mesothelioma and asbestosis. Asbestos has interactions with other harmful agents like cigarette smoke that magnify its adverse effects. Particle composition and size have played an important role in understanding asbestos' mechanism of action and potency. The body of evidence on asbestos is extensive and includes epidemiology and animal studies that have been thoroughly analyzed by experts in the field. Many researchers have devoted their careers to understanding and treating the deadly impacts of asbestos exposure. Several leading scientific bodies within and outside the US have issued in-depth assessments of the links between asbestos and lung disease and death. Prevention of exposure to asbestos has been a priority of the industrial hygiene and public health communities. Scientists with strong asbestos-related expertise have played a central role in all these activities.

The U.S. Government has repeatedly sought the advice of leading asbestos experts. The National Academy of Sciences (NAS) formed a Committee on Nonoccupational Health Risks of Asbestiform Fibers in the 1980s which issued an influential report heavily relied upon by EPA and other agencies. In 1983, the Consumer Product Safety Commission created a panel of experts to advise on the risks of asbestos in children's products. The EPA Science Advisory Board (SAB) convened an expert committee to review the methodology and analysis that formed the basis for EPA's 1988 IRIS assessment for asbestos. In 2008, the SAB formed another asbestos committee to review cancer potency factors for inhalation exposure in the 1988 assessment. Most recently, in 2011, the SAB convened a committee of asbestos experts to review the IRIS assessment of Libby amphibole asbestos.

The EPA TSCA evaluation will be the Agency's first comprehensive update of the science on asbestos since the 1980s. It has the potential to reinterpret the extensive body of data on asbestos and human health and revisit well-established scientific findings on asbestos' hazards, mechanism of action and potency. The implications of the evaluation for the many asbestos prevention and abatement programs now in place in the U.S. and globally could be far-reaching.

This makes it imperative that EPA seek the advice and recommendations of leading asbestos experts before finalizing the evaluation. The only credible way to obtain this independent scientific input is to create a special review panel charged solely with reviewing the evaluation. The selection of the panel should be vetted with the public and the panel should receive a specific set of charge questions, consider the comments of interested parties and other experts, hold one or more public meetings and provide a detailed report of its findings to the Agency.

In response to EPA's September 13 request for nominations of peer reviewers for the 10 evaluations, ADAO submitted the names of several qualified asbestos experts to the SACC on October 24. We believe these scientists would be excellent candidates for the asbestos review panel.

We look forward to working with EPA to assure that the draft asbestos risk evaluation receives full and comprehensive peer review.

Sincerely yours,

Linda Reinstein, Asbestos Disease Awareness Organization, President and Cofounder
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cc: Jeff Morris
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