



August 11, 2016

Administrator Gina McCarthy
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Dear Administrator McCarthy,

Congratulations on successfully hosting two TSCA implementation stakeholder meetings this week—yet another important step toward protecting public health and the environment from the risk of toxic exposure.

On behalf of the Asbestos Disease Awareness Organization (ADAO), we are excited to continue working with the U.S. Environmental Protection Agency (EPA) on implementing the Frank R. Lautenberg Chemical Safety for the 21st Century Act. As a stakeholder dedicated to preventing asbestos-caused diseases, ADAO urges you to prioritize asbestos in 2016 as a high-risk chemical for evaluation.

According to the law, the EPA is mandated to prioritize 10 high-risk chemicals for the first round of TSCA risk evaluations. These top 10 chemicals must be selected from the 2014 TSCA Work Plan for Chemical Assessments, which has screened and scored nearly 100 chemicals, with preference given to chemicals that have a “persistence and bioaccumulation score of 3,” and are “known human carcinogens and have high acute and chronic toxicity.”

Asbestos remains the poster child for the failure of the 1976 TSCA and now stands as the litmus test for the success and efficacy of TSCA reform. As we both heard, President Obama became the first sitting U.S. president to publicly acknowledge the dangers of asbestos: “the system was so complex, it was so burdensome, that our country hasn’t even been able to uphold a ban on asbestos—a known carcinogen that kills as many as 10,000 Americans every year. I think a lot of Americans would be shocked by all that.”

The vast majority of Americans aren’t able to identify asbestos or manage the risk of exposure. More than 55 countries have banned asbestos and now use economically viable safer substitutes, yet the United States Geological Survey (USGS) reported that in 2015, the U.S. imported 358 metric tons of asbestos “to meet manufacturing needs.” In fact, the chloralkali industry accounted for an estimated 90% of U.S. consumption. Asbestos must be prioritized to reduce and one day eliminate asbestos-caused diseases through the prohibition of asbestos in manufacturing, processing, use, distribution in commerce and disposal.

American consumers are concerned about the lack of regulation over the toxins actively present in commerce. Prioritizing asbestos on the 2016 top ten list will begin to rebuild consumer trust, while also sending a powerful message about the EPA’s bolstered authority and strong commitment to protecting public health and the environment.

As you said, “this law is a huge win for public health, and EPA is eager to get to work.” Remembering the 200,000 Americans who have died from preventable asbestos-caused diseases in the nearly three decades since the EPA’s failed 1989 attempt at an asbestos ban, ADAO urges the EPA to prioritize asbestos as one of the first 2016 10 high-risk chemicals for evaluation and take regulatory action to end the asbestos man-made disaster.

ADAO looks forward to meeting with you in September to discuss startling new mesothelioma mortality data from the Center for Disease Prevention and Control (CDC), and about the impact asbestos continues to have on public health and the environment.

Sincerely,

Linda Reinstein, President and Co-Founder
Asbestos Disease Awareness Organization (ADAO)