I am Dr. Celeste Monforton, a lecturer at Texas State University and a member of the American Public Health Association (APHA). APHA has 150 years of experience speaking out for policies back by science, and our mission is to improve health and achieve health equity.

We are approaching the four year anniversary of the Lautenberg Chemical Safety Act---a legislative accomplishment where ASBESTOS was used to illustrate the profound need for a stronger law. Yet we are no closer to banning asbestos than when the law passed.

Since that time, APHA has submitted comments and met with EPA at every opportunity to explain the grave health risk of exposure to asbestos—PARTICULARLY, to workers and to communities of color that already experience health inequities because of income, race, and ethnicity.

In May 2019, APHA testified before Congress to express our deep concern that EPA’s decisions to-date would fail to address the threat asbestos poses to public health.

The agency’s draft risk evaluation is incomplete and its assumptions inappropriate.

It fails to address, for example, the risk created by the millions of metric tons of asbestos already in use ----This means ignoring the risk to communities where families live in substandard housing and children going to school where cities have disinvested in public buildings.

This risk is increasing because of extreme weather events brought on by climate change.

EPA indicates it reviewed asbestos air concentration data from OSHA inspections. EPA does not mention, however, the 22 states and territories that operate their own OSHA programs. Most of these agencies have their own analytical laboratories and maintain their own data of sampling results.

When assessing this data, EPA should assume samples collected by inspectors are the best-case scenario. The safest day for workers is when an inspector is present ----it’s all the other days we need to worry about.

EPA must also take into account the family members who are exposed secondarily to asbestos through occupational take-home exposures.
EPA should examine asbestos violation data from OSHA, not merely the air sampling data. Violations provide evidence of workers’ potential exposure to asbestos. Citations are not contingent on violating the PEL.

This is a critically important point because the OSHA limit is not health based. The PEL is what was deemed feasible 25 years ago when the standard was adopted.

OSHA acknowledged that 6 workers for every 1,000 faced an excess risk of lung cancer EVEN IF employers fully complied with the asbestos standard.

EPA must also be more judicious when it relies on information provided by organizations with conflicts of interest in the outcome of the risk evaluation.

EPA must assess the reliability of this information—-The benefit of the doubt must BEND toward public health.

More than a decade ago, APHA called for a complete ban on asbestos. We remain STEADFAST in that position and why we strongly supports the ban asbestos bill being considered by Congress.

I’m going to pass the microphone NOW to Patrick Morrison.

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