

STATEMENT FROM LINDA REINSTEIN ABOUT PART ONE CHRYSOTILE ASBESTOS RISK EVALUATION AND MANAGEMENT

I'm Linda Reinstein the cofounder of the Asbestos Disease Awareness Organization (ADAO) and a mesothelioma widow.

Since 2004, ADAO, an independent nonprofit organization, has been dedicated to preventing asbestos exposure and to eliminate all asbestos-caused diseases. As you know, asbestos, a known carcinogen, can still be found in our air, water, soil, on consumer shelves and in millions of buildings.

The EPA understood that asbestos presented an unreasonable risk and they banned all six fiber types in 1989; however, the ban was overturned by pro-asbestos industry legal actions. Since then, the US has consumed nearly 400,000 metric tons of asbestos and we have buried one million Americans who have died from asbestos-related diseases. Each year, nearly 40,000 more Americans die from these entirely preventable diseases. Attempting to manage the risk of asbestos has been grossly ineffective and deadly.

ADAO was hopeful in June 2016 when the Lautenberg Chemical Safety Act was signed into law. Four years later -- we are still years away from an asbestos ban.

We recognize and support EPA's determination in the Part One Chrysotile Asbestos Risk Evaluation that six asbestos uses present an unreasonable risk to health. However, in other ways, the evaluation is dangerously flawed and incomplete. No other country in the world has ever had an evaluation of only one fiber, two diseases, and limited conditions of use.

In fact, EPA's own scientists vociferously objected to its limited nature, and spoke out against its limitations. In short, EPA has failed to finish the job Congress gave it after four years. Waiting for a separate Part Two to evaluate the risk of legacy asbestos and the five other fibers is unreasonable and will lead to increased preventable deaths.

Our position is that the six chrysotile asbestos uses found in Part 1 must be banned. ADAO commends EPA for determining the use of chrysotile asbestos diaphragms in the Chlor-alkali industry present unreasonable risk to health.

For more than a decade, ADAO has highlighted the numerous pathways of exposure from Chlor-alkali asbestos diaphragms as known from the mines, to the ports, to the plants, and then disposal sites, despite there being affordable substitutes for conversion. But progress had been made. In 2017, EPA reported there were just three companies with 15 plants using asbestos diaphragms. According to the Chlorine Chemistry Division 2020 numbers, Olin and Oxy now have 10 plants in 6 states using asbestos diaphragms. This proves that suitable substitutes can be used without disrupting production or financial hardship to the company or end-users.

Asbestos is deadly and can't be safely managed. In the US, there are more than 300 asbestos superfund sites that endanger the surrounding communities, often of color and/or without access to care every day. Towns like Libby, MT, Ambler, PA, and Davidson, NC reaffirm

there is no safe level of asbestos and cleaning up corporate crimes is expensive in dollars and lives.

We urge the EPA to promulgate a rule to prohibit imports and use, and rectify the glaring holes in the Final Risk Evaluation released by the previous administration. Americans can't wait. We urge you to act now.