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September 27, 2023

Subject: Opposition to the Nomination of Dr. Dennis Paustenbach as a Peer Reviewer for the "2023 White Paper on the Quantitative Human Health Approach to be Applied in the Risk Evaluation for Asbestos Part 2 under the TSCA" (Docket Number: EPA-HQ-OPPT-2023-0309)

Dear Dr. Freedhoff,

On behalf of the Asbestos Disease Awareness Organization, I formally express our deep concerns and opposition to the nomination of Dr. Dennis Paustenbach as a potential peer reviewer for the "2023 White Paper on the Quantitative Human Health Approach to be Applied in the Risk Evaluation for Asbestos Part 2 under the Toxic Substances Control Act (TSCA)." This letter serves as a formal objection to his candidacy, and we urge the Environmental Protection Agency (EPA) to reconsider this nomination.

While Dr. Paustenbach has an extensive background and experience in the fields of toxicology, risk assessment, and industrial hygiene, there are significant concerns and conflicts of interest that make him an unsuitable candidate for this important peer review process.

My objections are outlined below:

Conflicts of Interest: Dr. Paustenbach has a long history of involvement with industries that have a vested interest in the continued use of asbestos. His prior affiliations and consulting work for chemical and environmental risk assessment firms, as well as his association with the Essential Minerals Association, American Chemistry Council, and other industry groups, raise concerns about potential conflicts of interest that could compromise the integrity of the peer review process.

Dr. Dennis Paustenbach has previously collaborated with Ford Motor Company, where he was approached to study the potential association between asbestos in brakes and mesothelioma, a type of cancer almost always linked to asbestos exposure. This collaboration resulted in substantial financial gains for Paustenbach's consulting firm, Exponent, and another firm he co-founded, Cardno ChemRisk, amounting to nearly \$40 million in funding for research articles and expert testimonies aimed at disputing the connection between brake mechanics and mesothelioma. These efforts constitute "science for sale," as it is obvious the result of his work was to create doubt in scientific findings related to these workers and to aid Ford in avoiding legal liability.

Lack of Objectivity: Given Dr. Paustenbach's extensive involvement with industries that have a stake in asbestos regulation, there is a reasonable concern that his perspective may not be impartial or unbiased in evaluating the health risks associated with asbestos exposure. This lack of objectivity could undermine the credibility of the peer review process and the resulting White Paper.

Public Comment from ADAO

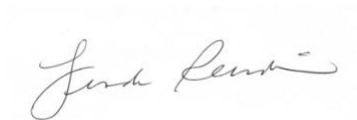
Public Perception: The nomination of Dr. Paustenbach, with his extensive industry ties, will erode public trust in the EPA's commitment to conducting rigorous and independent scientific assessments. His professional affiliations with Exponent, ChemRisk, and Cardno-ChemRisk will raise doubts that he can serve the best interests of the American people on the Part II panel for this important review.

In light of these concerns, I respectfully request that the EPA reconsider the nomination of Dr. Dennis Paustenbach as a peer reviewer for the "2023 White Paper on the Quantitative Human Health Approach to be Applied in the Risk Evaluation for Asbestos Part 2 under the TSCA." It is imperative that the peer review process for such a critical document is free from any perceived bias or conflicts of interest.

The facts are irrefutable: 1) Asbestos is a human carcinogen. 2) All forms of asbestos can cause disease or cancer. 3) There is no safe level of exposure. The community of peer reviewers who work to craft the regulations that will keep Americans safe from this toxic substance must be free from conflict if the process is to be comprehensive and the result of these efforts are to be trusted by the American people

Thank you for your attention to this matter. I trust that the EPA will carefully consider this objection and take appropriate action to ensure the integrity and credibility of the peer review process.

Sincerely,



Linda Reinstein

President and Cofounder Asbestos Disease Awareness Organization