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August 14, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460-001

Dear Administrator Wheeler,

I am writing to submit comments on behalf of the Mesothelioma Applied Research Foundation for the Asbestos Problem Formulation Docket (EPA-HQ-OPPT-2016-0736). As the executive director for the only nonprofit, charity organization dedicated to ending mesothelioma, it is my duty to speak on behalf of patients and their families who have suffered unspeakable loss by mesothelioma.

The Centers for Disease Control (CDC) defines malignant mesothelioma as a “neoplasm associated with occupational and environmental inhalation exposure to asbestos fibers and other elongate mineral particulates” (Mazurek et al., 2017). The scientific community agrees asbestos exposure is a contributing factor to the development of mesothelioma. However, despite regulations and a decline in new asbestos use, the number of deaths from mesothelioma has increased. As indicated in the same CDC report, this may be because “current exposures to commercial asbestos in the United States occur predominantly during maintenance operations and remediation of older buildings containing asbestos (Mazurek et al., 2017). This latter asbestos use is also known as “legacy” use. An article published in the Scientific American in 1997 estimated that 20 percent of homes and buildings in the United States contained asbestos (Alleman, Mossman, 1997).

The Frank R. Lautenberg Chemical Safety for the 21st Century Act gave the Environmental Protection Agency (EPA) authority to review asbestos exposure. However, the EPA’s decision to exclude legacy uses from the asbestos problem formulation will not provide the agency with a full data set to assess the magnitude of the problem when reviewing asbestos. By not considering historic data, the EPA will be using flawed figures when evaluating risk related to asbestos exposure.

The EPA's proposed asbestos problem formulation is a step in the wrong direction and does not account for asbestos remaining in existing structures. The federal government should be strengthening regulations that protect the public from asbestos exposure instead of weakening such regulations. The Mesothelioma Applied Research Foundation strongly opposes the agency's proposed changes to the asbestos problem formulation and urges the EPA to include legacy uses in the scope.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Hesdorffer', with a long horizontal flourish extending to the right.

Mary Hesdorffer, Executive Director
Mesothelioma Applied Research Foundation