

March xx, 2017

To: Mr. Robert Courtnage
Agency Contact
US EPA
Docket No. EPA-HQ-OPPT-2016-0736

Phone Number: 1-202-566-1081

Re: Public Comment for Asbestos docket - TCSA Revision
Frank R Lautenberg Chemical Safety Act for the 21st Century
Scoping Document for Establishing Risk Evaluations
Conditions of Use and Exposure of Susceptible Subpopulation:
Students, Staff and General Public Occupants of School Buildings

Eminent scientists and health professionals have contributed information to this Docket concerning asbestos and its deleterious effects on human health. I concur and support their findings and conclusions. As a member of a particularly specific subpopulation of individuals responsible for the health and welfare of occupants of school building facilities in Connecticut, I have additional considerations to place on the Docket.

Reading the *Preliminary Information on Manufacturing, Processing, Distribution, Use and Disposal of Asbestos* it is evident that in scoping potential exposures and assessing risks this document is forward looking, that is, to new materials and continued “uses” of asbestos posing an exposure risk. An area of great concern to me is the presence of legacy building materials in the nation’s, and in Connecticut’s, schools. These create potential exposure to citizens, staff, teachers and students as these materials age and deteriorate. With release of deadly asbestos fibers as a risk assessment criterion, it should be acknowledged that every day we “use” the flooring, ceilings, walls, insulations and fireproofings that are in our buildings. The “use” of the material does not end at the time of installation. For many of these materials, the “use” only *begins* at installation. Most certainly, my building “users” are at risk of asbestos exposure from installed legacy ACMs caused by vibration, air erosion, water damage and inadvertent or accidental physical contact by students, teachers, staff, citizens and tradesmen.

So I am very interested in EPA’s maintaining the asbestos-in-schools aspects of the TSCA regulation, especially highlighted in Subchapter II. Connecticut has one of the most robust state programs for asbestos-in-schools, as demonstrated in the 2015 report by Senators Markey and Boxer. But erosion of the federal program could have detrimental effects on continued public, budgetary and legislative support for my State’s program. As the Senators’ report shows, most schools in Connecticut – as in most of the 20 States whose governors’ representatives answered the Senators’ letter – still have asbestos-containing materials present in installed legacy materials. The conditions of these materials only deteriorate with age and use.

Four particular concerns I have about future scoping of these uses and exposures involve:

- (a) Libby amphiboles in spray-on fireproofing ironically installed after the EPA 1973 ban on fireproofing containing the six federal minerals regulated as asbestos;
- (b) the use of wall system joint compounds with less than 1% asbestos content;
- (c) the unintentional re-installation of new (still legal) ACMs after hard-won resources are expended to remove known, hazardous, installed materials containing asbestos; and
- (d) maintenance of environmental justice initiatives to protect our financially strapped inner city school occupants.

As such, I applaud and support efforts to ban the continued installation of materials containing asbestos in buildings, to widen the definition of asbestos to include Libby amphiboles, to abandon the 1% threshold now defining an ACM in building materials (which is not based on health, but outdated analytical limitations) and to preserve the environmental justice initiatives for AHERA facilities.

Thank you for your time and consideration.

Name: _____

Position: _____

LEA: _____

Town: _____ State: _____

Signature _____

Date: _____