

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 - TSCA Revision  
Frank R Lautenberg Chemical Safety Act for the 21<sup>st</sup> Century  
Scoping Document for Establishing Risk Evaluations  
Conditions of Use and Exposure of Susceptible Subpopulation:  
**Clients of Asbestos EPA Accredited Professionals:  
Inspectors, Management Planners, Abatement Project Designers,  
Abatement Supervisors & Workers, as well as Project Monitors.**

Eminent scientists and health professionals have contributed information to this Docket concerning asbestos and its deleterious effects on human health. We concur and support their findings and conclusions. As EPA accredited individuals we serve and protect our building owner and occupant clients from asbestos exposure by determining asbestos-containing material presence, creating management strategies that reduce exposures, planning for and abatement of asbestos-containing material hazards not otherwise manageable, and verification of successful remediation of asbestos-containing material related exposures.

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 manufacturing new materials and continued “uses” of asbestos posing an exposure risk. An area of greater concern to us is the presence of legacy building materials in buildings. These materials are the object of our contribution to the betterment of human and environmental health. Every time we examine buildings, create management strategies, review sites for planning, remove materials and affirm reoccupancy suitability we lessen the asbestos exposure risk to our building owner clients and their facilities’ occupants.

We truly consider that our work relates to our clients’ “use” of these legacy materials. Our clients do not benefit from the exposure protections we do as asbestos professionals. Installed legacy asbestos containing materials create potential unprotected exposure to citizens as these materials age and deteriorate. With release of deadly asbestos fibers as a risk assessment criterion, it should be acknowledged that every day citizens “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, building “users” are at risk of asbestos exposure from installed legacy asbestos-containing materials caused by vibration, air erosion, water damage and inadvertent or accidental physical contact by citizens and tradesmen

We look forward to the day when these legacy materials are out of the building environments altogether. This requires the assurance that the replacement materials installed after our abatements are not repeating the cycle of placing these toxic minerals right back into the facilities from which we have removed them.

Such an asbestos ban on newly installed construction materials also protects miners, millers, manufacturers, installers, building occupants, waste haulers and landfill operators, as well.

Additionally troubling in this regard is the presence of loose fill vermiculite in millions of homes and as a contaminated additive to many spray-on fireproofings in commercial buildings, hospitals, schools and public gathering places.

As such, we applaud and support efforts (1) to ban the continued installation of materials containing asbestos in buildings, (2) to widen the definition of asbestos to include Libby amphiboles, and (3) to abandon the 1% threshold now defining asbestos-containing materials in building materials.

Thank you for your time and consideration.