# U.S. EPA Public Webinar on Draft Risk Evaluation for Asbestos Part 2: Supplemental Evaluation Including Legacy Uses and Associated Disposals of Asbestos

## May 13, 2024, 3-4pm EST

### \*note: due to technical difficulties the first few minutes of the webinar was not recorded\*

**Brandall Ingle-Carlson, U.S. EPA**: And finally, dermal and oral exposures were considered for this. So this scope for Asbestos Part 2 Risk Evaluation was released in June of 2022. And then August of 2023, the Asbestos Part 2 white paper and letter peer review was conducted. And these peer review comments were incorporated into the Draft Risk Evaluation that we released last month. And the Final Risk Evaluation will be released in December of this year. I also wanted to note that in March of 2024 the Asbestos Part 1 Final Rule was released; so that was the Risk Determination from Part 1, which is why we decided to split it into two parts to move that forward.

And then, also in August of 2023, EPA put out a data call in under TSCA Section 8 requesting that information on manufacture and process of asbestos in the last 4 years be reported, and we're in the middle of that reporting period right now. So if any important new data comes in through the end of this month, then we'll be considering that in our Final Risk Evaluation for Asbestos Part 2.

To get you oriented on the draft risk evaluation, I wanted to give you a quick overview of where all the data falls within the assessment. So physical chemistry and fate is covered in section 2 and this of course informs our release assessment, which is in section 3. Releases to ambient air impact general population exposure, environmental exposure, and ecological exposure scenarios. In addition, we look at occupational exposure, take-home exposure, and DIY (or consumer) exposure. And these are all covered in sections 3, 4, and 5. You'll note that inhalation exposure is the focus for the human exposures and dermal and ingestion were considered for ecological.

The hazard assessment is also found in section 5. It looks at occupational, consumer, and general population hazard values for lifetime cancer and non-cancer chronic.

And this comes together, this exposure and hazard assessment comes together, in the risk characterization section, section 5.3, looking at occupational risk, take-home risk, DIY risk, and general population risk. And ultimately this is what we base the risk determination on.

So with that, I'm going to pass it off to our technical leads.

Juan Bezares Cruz, U.S. EPA: Thank you, Brandall. My name is Juan Bezares, I am one of the fate assessors that help develop the environmental status of asbestos fibers.

Now we will take a quick look at some of the physical and chemical properties of asbestos fibers that will help us understand how these fibers are expected to interact with the environment after the release.

This table contains information relevant to the 6 main asbestos fibers, as well as Libby Amphibole, which is a mix of winchite, richterite, and tremolite. In general, all asbestos fiber types consist mainly of silicate structure with magnesium, sodium, iron, or calcium and some water.

The strong covalent bonds between silicon and oxygen in the silica structure are responsible for the environmental stability, negligible water solubility, hardness, and the high tensile strength of asbestos fibers. Due to the small fiber size, asbestos fibers can remain suspended in air and water and will

eventually settle into soils and sediments, with higher deposition rates close to sources of asbestos. Wastewater treatment processes are expected to remove asbestos fibers and released into wastewater treatment sludge.

Under normal conditions, terrestrial and aquatic organisms are not expected to uptake asbestos fibers, although it is possible, close to asbestos sources.

During the incineration of asbestos containing materials, of asbestos fibers have been reported to transform into non-asbestos fibers during the recrystallization process with negligible releases to air.

In summary, asbestos fibers are stable in the environment, are expected to settle into soil, sediment, and biosolids produced during wastewater processes, and uptake of asbestos fibers by terrestrial and aquatic organisms is not expected under normal environmental conditions.

Now we'll move to Emily Nolan, who is going to be presenting the environmental risk section. Thank you, Brandall.

**Emily Nolan, U.S. EPA**: Thank you, Juan. My name is Emily Nolan, and I am the environmental hazard assessor for Asbestos part 2.

A key takeaway and difference from the environmental hazard assessment from part 1 to part 2 is the inclusion of terrestrial organisms in part 2.

We re-evaluated the aquatic hazard with the inclusion of additional studies that were not captured in part 1. We calculated 3 concentrations of concern: one acute and two chronic. Two chronic concentrations of concern were calculated due to the physiological difference between mollusks and fish. We reported the acute COC, which is concentration of concern, for mollusks to be 20 fibers/L of chrysotile asbestos. The chronic concentration of concern for mollusks was 10 fibers of chrysotile asbestos per liter and the chronic COC for fish was calculated to be 10,000 fibers of chrysotile asbestos per liter.

A risk quotient and ultimately risk itself was unable to be determined for aquatic hazard due to the limited availability of exposure data outside of superfund sites. These sites do not accurately represent aquatic habitats, and therefore, we were unable to find a value to use to calculate risks.

We evaluated terrestrial organisms in part 2. The data did not include our standard ecological organisms, but we were able to capture non-human animal species that are typically used in our human health hazard assessments. The endpoints that were reported in these studies focused on cancer and cancer is not a relevant ecological endpoint that we use to determine hazard.

Therefore, terrestrial hazard was not calculated for asbestos. But in agreement with part 1, it was determined that there is very limited potential for asbestos exposures in aquatic or sediment dwelling organisms and risk is not observed from exposure to asbestos fibers.

And I can pass it along. Thank you.

Aaron Murray, U.S. EPA: Hey everybody. Sorry I'm having a bit of camera issues here. Alright.

Hey everybody, I'm Aaron Murray. And I worked on the occupational exposure and environmental release assessments for the asbestos part 2 Risk evaluation.

The figure shown here is known as the life cycle diagram, which is a common element of a risk evaluation. The life cycle diagram summarizes the industrial, commercial, and consumer conditions of use, including the stages of life for the various uses of the chemical. The life cycle diagram for asbestos part 2 is unique in that there are no manufacturing or processing stages considered for the legacy use. Rather they're only the use and the disposal stages.

The conditions of use were largely determined from the uses listed under the Asbestos ban and phase out rule of the late 1980s. Also, the life cycle diagram includes uses of talc and vermiculite products that may contain asbestos. So that was just a brief summary of the life cycle diagram for Asbestos Part 2.

### Next slide, please.

Now shifting from the life cycle diagram to occupational exposure assessment of the industrial and commercial conditions of use. The figure on the right here shows the occupational exposure assessment workflow for asbestos part 2.

Inhalation monitoring data were used for all the occupational exposure scenarios. And the sources of the monitoring data include OSHA chemical exposure health data, NIOSH health hazard evaluations, and peer reviewed studies from a systematic review process. Regarding dermal exposure, it was determined that the dermal uptake of asbestos fibers was not a relevant route of exposure due to the physical form of asbestos fibers.

The worker populations that were captured in the occupational exposure assessment were average adult workers older than 16 years of age, and females of reproductive age.

And there were some short-term monitoring data that were used where exposures were measured for up to 30 min, but the majority of measurements were closer to a full shift measurement. All exposure measurements were converted to 8-hour time weighted average exposure values for, you know, purposes of risk calculation.

Where there were enough data available in inhalation monitoring, data were grouped by activity. So specifically any data where, from scenarios where asbestos was disturbed through activities like cutting or sanding or grinding, were considered higher exposure potential. Whereas personal breathing zone data from workers who were reported to handle the material only, without cutting or grinding, were categorized as lower exposure potential.

And lastly, exposure to occupational non-users, were characterized for each scenario. Where occupational non-users are workers that are in the vicinity of ongoing work, but don't handle any of the materials themselves.

And so this summarizes the occupational exposure assessment for asbestos part 2. And next we'll hear about take-home exposures.

Laura Krnavek, U.S. EPA: Hi, my name is Laura Krnavek and I will be talking about the non-occupational exposure scenarios.

The first one is take-home. In the take home exposures, we estimate the inhalation of asbestos fibers brought home by the workers. In the figures shown here, which are the ones that you'll find in the document for familiarization and easy finding, on the top you can see the figure that basically

summarizes the take home exposure scenario. Briefly, the worker will have an exposure to some airborne fibers, and those will be attached to the clothing and this worker will bring it home, in a nutshell. Once at home this person will, or some other person, can handle the clothing. That person is called the handler. And those fibers will become airborne and therefore available for inhalation.

In addition, we also consider bystanders, which are people that are not necessarily handling the clothes but are in the proximity of the handling of the clothes.

Some important facts of this scenario to remember are that the source of the fibers on the workers clothes, or the person bringing in the fibers home, come from the occupation exposure scenarios for the duration of the exposure, they are the same ones used in the occupational exposure scenarios as well.

For the bystanders, we consider different exposure durations. We considered 0 to 20, which you'll find in the main narrative of the document, but we also can see there are other durations of exposure from 20 to 50 and lifetime as well, just to give that consideration and calculate the risk for those people.

Another important fact of this take-home is that we simplify the scenario by calculating the exposures from one clothing and one episode of handling the clothes. Now we know that potentially workers can use multiple clothing or can use the same clothing multiple times. By calculating one clothing and one handling scenario we can then extrapolate to all sorts of use patterns.

For the consumer exposures, we calculated exposures to inhalation of asbestos from do-it-yourself activity-based scenarios in which asbestos containing materials are modified and then the asbestos fibers are released and therefore available for inhalation. These DIY scenarios are for people 16 and older, for 62 years of duration. The 62 years of duration can be intermittent depending on the activity and the product that we are assessing. A little bit more on that in a minute.

We also looked at the exposure to bystanders, which are people that are in the proximity of the activity being done but not performing the activity themselves. So in this scenario, for DIY, we split the modifying activities in two: repair and removal. Repair are the activities that we assume are tasks done once per year. The length of that activity can vary depending on the product and the intensity of the project itself. And those are captured in the low, high, and medium end scenarios. The removal activities were assumed to be done only once per lifetime. The assumption that once an asbestos-containing material is removed there will not be a substitute for more asbestos.

There will be only once in a lifetime however multiple removals can happen by one person so that can be available in the aggregate scenarios.

The final non-occupation was gen pop. In the gen pop, we looked at the exposures to asbestos fibers released into the environment from occupational scenarios. And then the dispersion and transportation of those fibers away from the source to different distances. Also the incorporation of these fibers into the indoor environments, available at those distances. And that is shown in the figure at the bottom with the circle. You can see the different locations in the dispersion model calculating the concentrations at the different distances.

We also looked at different exposure durations depending on the activity. The activities were also classified as stationary and non-stationary. The stationary activities are more about facilities, like landfills for example, and because those are stationary the durations are longer, 0 to 20, for example, and

additional exposure durations were also considered and available in the appendices as well. The nonstationary activities were, for example, applied to activities like demolition and removal of asbestos containing materials and firefighting activities and these exposures were assessed for 0 to one year.

In the figure of the top corner, we're basically summarizing how we did the analysis, the source of the environmental releases of asbestos fibers into the environment are from occupational exposure scenarios from monitoring data. We use that data to calculate the dispersion model using IIOAC and AERMOD and we also compare this to available monitoring data to make a comparison of our results. That's also available in the RE.

Thank you.

<u>Christelene Horton, U.S. EPA</u>: Good afternoon, my name is Christelene Horton, and I will be discussing the human health hazard.

The EPA has chosen a cancer inhalation unit risk, henceforth denoted as IUR of 0.2 per fiber/cc, which accounts for the EPA's existing IURs. The 1998 risk evaluation or RE had an IUR of 0.23 per fiber/cc. The 2014 IRIS assessment was 0.17 per fiber/cc, the 2020 Risk evaluation had an IUR of 0.16 per fiber/cc. This is based on mesothelioma and lung cancer with quantitative adjustment for laryngeal and ovarian cancers. A sensitivity analysis was conducted on the IURs of 0.2 per fibre/cc and found that there was no change in risk across the IUR previously mentioned.

In non-cancer POD or point of departure based on the 2014 POD in the IRIS Libby Asbestos assessment of 0.026 per fiber per CC was selected. The outcome use for the POD was localized pleural thickening or LPT. The data for the outcome was from the O.M. Scott Cohort, which is located in Marysville, Ohio. This was the most robust and relevant information for dose response analyses with over 50 years of followup.

Thank you.

Brandall Ingle-Carlson, U.S. EPA: So this is Brandall Ingle-Carlson. I'm going to take back over.

So, for risk characterization, we wanted to note that the EPA does understand that friable asbestos that are modified, for example, removed, sanded, cut, or disturbed, release fibers. And asbestos containing materials that stay in place without modification are not expected to result in release and therefore not expected to result in human exposures and risks.

So EPA used measured an estimated air concentrations to calculate exposure concentrations for this risk assessment. We looked at an average daily concentration and a margin of exposure and an excess lifetime cancer risk or ELCR.

So the estimated risk for the populations from non-cancer chronic and lifetime cancer are provided in a table below. For occupational exposures we looked at an ELC of 10<sup>-4</sup>. For DIY and take-home, it's 10<sup>-6</sup> for the general population it covers that full range. For occupational and non-occupational exposures we had in benchmark MOE of 300.

So for the risk characterization approach, I just wanted to zoom back out a minute and kind of remind you of all the exposure scenarios that we've talked about so far, and note that we do understand that there are some sources of uncertainty associated with how those exposures were determined.

So for workers and ONUs, as a reminder, we looked at adolescents over 16 years of age. We had some more detailed information about certain job types and categories and so it was split into higher and lower exposure potential workers. Some of the key uncertainties that we recognize is that there were different numbers of workers for different conditions of use. There were uncertainties associated with which industries and occupations are associated with the uses that we assess. There were some splits between higher and lower exposed potential workers and large data variability for occupational non-users. And so there's some questions about representativeness of the data and the variability that's due to work practices because we understand that it individual might exist on that spectrum.

For take home and garment handling, there were some uncertainties associated with concentration data that might include non-asbestos and smaller particle sizes and therefore overestimate the risk. We also recognize that there's some variability due to the products and the asbestos concentration differences across the activities and different asbestos containing materials.

For our DIY and consumer exposure scenarios, we recognize uncertainty and determination of the products and the potential of the release of asbestos fibers associated with those activities. As well as the concentration data, again, might include some non-asbestos and smaller particle sizes and therefore overestimate the risk.

For general population, some of the uncertainties come from the meteorological data that was used for specific locations versus a generalized approach. As well as the number of emissions that you might expect per year. And bystanders for those scenarios had the same sources of uncertainty.

So ultimately these conditions of use were found to contribute to the unreasonable risk of asbestos. So there were 5 commercial and industrial conditions of use, which can be summarized as chemical substances in construction, paints, electrical and metal products with more details provided in a lot of words below. And then chemical substances in furnishing, cleaning, and treatment care products.

And these same categories were also found to contribute to unreasonable risk in consumer use. So you have chemical substances in construction, paint, electrical and metal products, and chemical substances in furnishing, cleaning, treatment care products.

And finally, there was a reasonable risk, or condition of use found to contribute to the reasonable risk, for the distribution for disposal.

So the purpose of this webinar was to give you that overview of the draft risk evaluation and now we're opening to solicit comments. We're seeking feedback specifically on the risk evaluation of asbestos in part 2. So this is limited to the scope of part 2. We are not requesting public comments on the hazard exposure or risk characterization sections of part 1, as those are going to be unchanged. So please don't submit comments on that they will not be addressed.

Specifically, you might be interested in providing comments on the take home exposure scenarios, the non-cancer endpoints, and the use of a single risk determination for asbestos.

We encourage all the potentially interested parties to provide their comments on this asbestos part 2 draft risk evaluation and, to the extent possible, we please request that you cite public data that supports your responses and describe any supporting data that's not publicly available.

Please do not include CBI in your comments. The Federal Register notice has details on CBI submissions if you feel that CBI is essential.

And please remember that comments must be submitted by June 17th and there's a link here that will take you to the site that you can use to submit comments. That's the only way we are accepting comments.

So, here's a couple of links that you might find relevant: the federal register notice for asbestos part 2, the draft risk evaluation document where you can submit your comments, our previous risk evaluation or the risk evaluation for asbestos under TSCA, and some general information on TSCA.

And if you have any technical questions, you can use the contact listed here, which is also listed on the Federal Register Docket.

And with that, I will turn it back over to Sarah. Thank you.

<u>Sarah Soliman, U.S. EPA</u>: Okay, so we are going to start with the registered public comments now. Virginia Crawford, you are going to be up first, but I'm going to talk for a minute because I just put you on the spot by that. So I'm going to give you a second if you need it. But I'm also going to just quickly, post all of these links.

Oh, that didn't show up well. Okay. In a minute, I will post those links in the chat as well just to make it easier for everyone.

So we are going to start at the public comments now. So, just a reminder to our 2 registered speakers that you have about 3 minutes to make your comment and then we will probably have a few minutes and we'll open it up to see if anyone else has any additional comments and we'll open it up. To see if anyone else has any additional comments.

First, we are going to have Virginia Crawford, who I actually do not see on the line right now.

Virginia, are you here?

Okay. So we will come back to her. So next we have Linda Reinstein.

Linda Reinstein: I am. Thank you. Thank you, Sarah. Great.

Sarah Soliman, U.S. EPA: Okay, Linda, the floor is yours.

<u>Linda Reinstein</u>: Thank you. So, my name is Linda Reinstein for those of you who I haven't met. I'm a mesothelioma widow and the co-founder of the Asbestos Disease Awareness Organization, ADAO, and we're an independent nonprofit.

So, for 20 years we have been working to prevent exposure to eliminate all asbestos-caused diseases and of course the deaths they cause, and thank you for giving me the opportunity to discuss EPA's Draft Part 2 risk evaluation. So we recognize EPA's gallant efforts to evaluate the risk of asbestos, but I want to set the facts straight.

All fibers are confirmed as a human carcinogen and we begin to talk about which fibers have a greater toxicity, we speak to the industries common propaganda that some fibers don't cause disease, which is erroneous. Every year 40,000 Americans die from preventable asbestos caused diseases. Now it's been 4

decades, nearly 4 decades, since the EPA did their last comprehensive studies. And we know asbestos can be found in homes, schools, and workplaces and also more importantly after national disasters.

You're right. Occupational take-home and bystander asbestos exposure kills. We're encouraged by the preliminary finding that you have recognized the unreasonable risk to human health. But we are concerned about the fast pace and the process for review. So we're very much eager to participate in public comments.

I want you to know that ADAO is inundated with emails and calls about the top 3 questions: "What is asbestos? Where is it and what do I do?" We are constantly educating the public about a legacy asbestos that can be found in floor tiles, etc. But more importantly, these calls often come after a natural disaster.

So we have a large problem with legacy asbestos to be addressed. And I know EPA is going to do a great job. For example, some of the regulations that have been, laws that have been passed, and rules have been promulgated. Let's use AHERA as an example. In 2015, Senator Ed Markey and Barbara Boxer had questions and concerns about asbestos in schools. They surveyed all 50 states. And that survey confirmed that there is a gap between knowledge, enforcement, and compliance. And I'm happy to produce that data.

I'm also deeply concerned about the new DIY oversimplification of repair and removal. With weather related disasters, since they are increasing, and 1st responders and firefighters face an increased risk, we need to look at the entire pathway of exposure. And recognizing that firefighters, through IARC studies and other studies, they have an elevated risk of mesothelioma, which is caused from asbestos.

Let's think about risk management and what needs to be done. I am concerned that the process to comprehensively evaluate the risk is being short-circuited. And that Americans deserve to have a robust review that leads to risk management that protects all of us. We, ADAO, have formally filed for an extension to Part 2 comments that are due on July 17<sup>th</sup>. For this meeting I want you to know people are finding a 400-page document, that is very dense and important, difficult to review to produce those comments. I hope you'll look at that letter and I'm happy to send you a copy.

I will be submitting a longer and referenced comment into the docket from that I'm using today. But more importantly, I know that you as staffers are working so hard to get this right. And we want we want the study to be, as I said, robust and comprehensive. And also impervious to industry's litigation that will once again compromise public health.

Thank you for your dedication and the opportunity to talk with you today. And I know my colleague Bob Sussman will also have comments.

Thank you.

**Sarah Soliman, U.S. EPA:** Thank you, Linda. We appreciate your comments. Next, we are going to have Brent Kynoch, I hope I said that correctly. I apologize, please feel free to correct me. The floor is yours.

Brent Kynoch: Thank you, Sarah. I appreciate it.

Hello, my name's Brent Kynock. I'm the managing director of the Environmental Information Association or EIA. EIA is a membership organization that was founded in 1983 as the National Asbestos Council.

We're a multidisciplinary organization, meaning we represent every person and organization that might be involved in the asbestos abatement industry.

Our members are companies, organizations, and persons involved in asbestos abatement and management in buildings and facilities. Our members include the entire vertical spectrum of those persons involved in that industry, including contractors, consultants, laboratories, training providers, regulators, equipment suppliers, owners, and managers. If anybody would like more information on our organization, you can find us at EIA-USA.org.

Because EIA represents such a wide range of persons involved in or concerned with asbestos in buildings and facilities, our organization has very rarely ever taken a position on any matters, instead we say our organization is one that collects all available information on asbestos and we distribute that information to our members and beyond for them to form their own opinions.

With that said, since 2012 the board of directors of EIA has supported a ban on asbestos. Our membership, because we're involved in the successful identification and abatement of asbestos in buildings, understands all too well the risks involved in asbestos exposure and for this reason, our organization supports an asbestos ban.

EIA is pleased that the Environmental Protection Agency is now making a single on reasonable risk determination for asbestos. In order to be succinct and brief on behalf of EIA, I want to focus on only 2 issues of concern. One, the recommendation from EPA that an occupational exposure value of 0.004 fibers per cubic centimeter be implemented in order to protect human health. And second, EPA's determination that individuals exposed through do-it-yourself activities are a PESS group of concern.

In regard to the occupational exposure recommendation, while we believe that EPA's research and study supports this 0.004 fibers per cubic centimeter value, there are substantial technical challenges involved in reading and reporting results to this level, given the current methods of air sample collection and analysis.

Further, any phase contrast microscopy method does not analyze for asbestos fibers. Instead, it counts any and all fibers with a defined width to length ratio. There are many available studies that have determined that PCM analysis misses many of the smallest fibers that can be detected by transmission electron microscopy.

In regard to the do-it-yourself activity concern, EPA offers really no recommendations for how to protect this potentially exposed susceptible subpopulation. And with apologies for not completely understanding EPA's authority under TSCA versus the Clean Air Act, our association recommends that EPA consider some way of protecting not only the DIY population but also contractors that may work in a home and the residents of that home.

Current NESHAP regulations are triggered in residential settings only when there are more than 4 units in the building or facility. This leaves a large percentage of the population possibly exposed to asbestos in their homes when either they do their own work or when they hire a contractor to do work that does not test for asbestos before conducting in a renovation or repair activity.

EIA recommends that EPA strives to create some kind of an asbestos rule similar to the renovator repair and painting rule, used for lead paint. And that concludes my comments. Thank you. <u>Sarah Soliman, U.S. EPA</u>: Thank you for your comments, Brent. Next, we are going to have Robert Sussman. Robert, the floor is yours.

**<u>Robert Sussman</u>**: Yeah, thank you. So, hope everybody can hear me. So, I'm Robert Sussman. I wear a couple of different hats. I am the legal counsel to the Asbestos Disease Awareness Organization and have worked closely with Linda and many others on EPA's various evaluations and rulemakings for asbestos.

I am also a long-standing environmental lawyer who served twice at US EPA. So, I know the agency and admire the good work that the agency does and also, want to salute EPA for its tremendous effort both on part 1 and now on now on part 2.

Let me say that this is a complicated and important evaluation. As the EPA staff undoubtedly appreciates.

The universe of legacy asbestos products reflects decades of extensive asbestos use throughout the economy for most of the 20th century. The potentially exposed population is extremely large and covers workers, consumers, and the general population. And the health effects of concern are very severe and occur at low levels of exposure.

We need to review the evaluation more closely but do believe that it must be more transparent and granular so that health professionals and the general public can grasp how many people are exposed to legacy asbestos, under what conditions exposure occurs, and the circumstances under which the risks associated with exposure are significant.

These are all areas that are covered in the draft evaluation. But what I'm not seeing is a layperson overview that will make the risk of legacy asbestos more understandable to the average person.

We also think it's critical that EPA not understate or disregard risks. We're concerned, for example, that exposure to asbestos in schools is not meaningfully addressed. That isn't to say that it's absent from the evaluation. But I think anybody trying to understand what the risk of asbestos in schools is will have a hard time extracting that from the document. This is troubling given the level of public concern and media interests regarding asbestos in schools, and the potential risks to teachers, parents, and young children.

It's also alarming that EPA reaches no conclusions on the contribution of several conditions of use to unreasonable risk, because it lacks exposure data. This creates the possibility that these exposure pathways will fall through the cracks and may not be included in risk management.

Finally, it is startling that EPA would conclude that toys, such as crayons known to be contaminated with asbestos, do not contribute to unreasonable risk, given how these products are used and handled by children.

We'll be providing more thoughts and information on these concerns in our comments. Thank you very much.

<u>Sarah Soliman, U.S. EPA</u>: Thank you, Robert. We appreciate your comments today. Oh, turn myself on, turn myself off. There we go. So, I put a couple links in the chat. Those are the links from the PowerPoint, including the one with the actual docket. If you have never submitted anything to the docket before, when you open that link, you'll see right on top it says Asbestos Part 2 Supplemental Evaluation and

there's a little button that says comment and that's where you can upload any of your comments or documentation.

We strongly encourage you to do that. With that, think we have time for one more comment if you would like to say something at the bottom of your screen there is a raise hand button.

So, I will give it a minute and see if anyone clicks that button and wants to make a final comment.

Oh, Amy, perfect. Amy, the floor is yours for the next 3 min.

<u>Amy Bahruth</u>: Oh, I don't need 3 min. I just, I actually have a question more than a comment and I don't know if this is the forum for that.

I just don't understand occupational exposures for people in workplace settings who are exposed to asbestos in their work environment, but no work is currently happening in those spaces.

So, we have a lot of asbestos exposure in schools as other, Linda, talked about a little bit, and it's passive. It's things not being maintained well, and people being exposed and in fact you know some of our members have developed disease as a result. So where do those folks fall in? Where do those kids fall in?

Sarah Soliman, U.S. EPA: Alright, so we are not answering any questions today. But we know...

### Amy Bahruth: I'm sorry].

**Sarah Soliman, U.S. EPA:** No, that's okay. I do recommend that you if that you can submit these to the docket. Or you can, I will actually shoot my email in the thing as well, and if anyone has any kind of questions or concerns or anything with the docket, I am not the expert, I can't really help you with the specifics, but I can definitely get you to the right person. So I'll put that in, I'll put my email in there.

Amy Bahruth: Thanks, Sarah. I really appreciate that.

Sarah Soliman, U.S. EPA: You're welcome.

We still got a few minutes. So, Kevin, you have the next 3 minutes and the floor is yours. Oh, you're on mute still. There you go.

Kevin Hutton: Thank you. And I also will not take 3 minutes.

I just want to add, I'm a training provider in New York State where we do asbestos training for the asbestos industry. Member of EIA and ADAO. And my biggest concern and I really appreciate what the EPA has done with the do-it-yourself side of things because we see that the people are doing asbestos abatement, that know they're doing asbestos abatement, are generally keeping themselves safe and keeping the people around them safe as well.

But I think the big issue, big concern we have here in New York State, is how frequently homeowner's do-it-yourself or less than knowledgeable contractors are out there doing disturbance without sometimes even realizing it. Yes, we have bad actors that they know they're doing it, but I think there are so many people out there that just don't realize they're doing it and don't realize the hazard that they're creating for other people, whether it's that the neighbor next door, the coworker, or bringing it home to their own family.

So, I really appreciate what the EPA is doing. I too am hoping that you have a longer, along with Linda, a little more time. 400 pages, I've been working on it trying to get through it all, but there's a lot to it. So I appreciate what everyone's been working on and realize we still have a lot of work to go.

Thank you, Sarah.

Sarah Soliman, U.S. EPA: Thank you, Kevin.

All right, well that brings us almost to the end of our time. So, before I close out, I wanted to see if any of the EPA people had any final comments on anything? Alright, well with that then, thank you to the fabulous EPA staff for your presentation. Thank you for our speakers. Thank you for giving us your comments. We appreciate it.

The link to the docket is in the chat, as well as my email if you have any issues with the docket, let me know and I can help you with that. I can't upload it for you, but I can at least I can talk you through the process.

So, with that, again, we thank you for spending some time with us, taking some time out of your afternoon, and I wish everyone a safe and healthy rest of their day.

Thank you so much and take care. Bye.