

Comments From Dr. Lippmann In Response To Memo from David Bussard, 7/24/2012

The issues selected by Dr. Bussard for discussion with the SAB LAA Panel were well chosen, and thoughtfully outlined in his 7-24-2012 memo.

With respect to Item #3 on fiber dimension information, I offer the following thoughts and suggestions on improvements to the August 2011 draft of EPA's Assessment entitled Toxicological Review of Libby Amphibole Asbestos.

The issue of the influence of fiber dimensions, and especially of fiber length, needs to recognize and utilize the insights presented in the thorough reviews of the topic that were provided by Lippmann (2009) and Mossman et al (2011), which were cited in the EPA's 4-11-2012 draft, and by the Berman (2011) paper, which was not cited. In particular, the Berman (2011) paper has shown that the cancer risk coefficients for various amphiboles are much more consistent across types of amphibole and populations when an exposure metric focussed on long fibers than when using more conventional exposure metrics. The Berman (2011) paper is listed on page 14 of the 7-11-2012 SAB LAA Panel draft. The Berman (2011) paper is also important in that it provides strong support for the SAB Panel's position that the amphibole risks are much greater than this for chrysotile.