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Members of the SAB Libby Amphibole Asbestos Panel
c/o EPA Diana Wong wong.diana-M@epa.gov
cc: individual members March 1, 2012

Subject: Libby Amphibole Asbestos Panel; Charge and Discussions ADDITIONAL
COMMENTS FROM TERRY TRENT:

Ladies and Gentlemen,

My apologies for not attaching the following paper. I wished to make it readily accessible, for the purpose of recognizing IJ Selikoff as an author. However EPA standards do not allow me to attach that paper directly: "Peto J, Seidman H, Selikoff IJ (1982) Mesothelioma mortality in asbestos workers: Implications for models of carcinogenesis and risk assessment. Brit Jour Cancer 45: 124-135". The El Dorado County Poster presentation is however attached and I would like to place emphasis on your seeing this. If for some reason you do not see it, I am easily found on popular sites on the Internet so please drop me a note and I will insure you get a copy.

If I were to be making legitimate comments regarding the IRIS Toxicological Review of Libby Amphibole Asbestos, which I AM NOT due to the reason that covering LA alone is not good enough, I would point out the following: The assessment contained and emphasized in the aforementioned Toxicological Review, that "ambient air" measurements lead to a current risk today of one in one million, is a real problem.

Ambient air measurements anywhere Tremolite in the world at pure or near pure environmental exposure scenarios all equal one in a million, or more precisely, very near 0 f/cc. It is worth noting that the same occurs with Erionite. Tremolite and Erionite clear from air very rapidly so much so as to making the initial disturbance the only thing worth measurement. Not so with Chrysotile and anyone having observed the differences in pure or nearly pure Tremolite and Chrysotile exposure scenarios can tell you the same thing. It is OBVIOUS before one brings out the measurement devices, which make it even more clear.

EPA's implied message is that the clean up in Libby, as measured by ambient air, has lowered the cancer and fibrotic risk. Well it may have and it may not have. Measurements of ambient air for Tremolite give no information at all, unless there has been a recent disturbance nearby. In which case the positive measurements tell you that there has been a recent disturbance nearby...nothing more. Using said ambient air measurements as a yard stick for determining whether or not an environmental clean up has worked, is utterly ridiculous.

Excursion level exposures begin in Libby Montana precisely as they do in Tremolite areas of California. The instant a homeowner steps out his or her door to sweep the steps, place a shovel in the garden, dust their car or any large number of various activities that can not be listed here...then they are exposed to highly variable, extremely localized, intimate concentrations of

Tremolite fibers. Ambient air measurements are impotent in the face of these types of exposures, at giving any useful information what so ever.

That is what I would begin to tell you if I were serious about the current charge given to the panel. But as I said, I am not. There has been too much manipulation to break Libby Amphibole away from asbestos protections deservedly and inaccurately afforded to all Americans for me to take the Toxicological Review or the charge given to the Panel seriously.

Thank you,
Terry Trent