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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:

ELEPHANT IN THE ROOM

Not attached hereto for reference: A paper that EPA does not share with the people of Libby, Montana; El Dorado County, California; Jefferson Parish, Louisiana; Chicago, Illinois or any of the asbestos activist groups in the United States: Most importantly co authored by Irving Selikoff: (1). 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. (2) Additional Materials Supplied by Dr. Julian Peto Are Attached 1985 Comments on the first draft of the 1986 EPA Report 1981 Report to the EPA on Asbestos in Schools. (3) Things a father doesn't know to and EPA/ATSDR do not tell their children. Terry Trent Poster Presentation 2002 Oakland Asbestos Conference, Tremolite exposures in residential areas of El Dorado County, California. (4) Power Point Presentation by Dr. Jerrold Abraham et al., important to note, no other fiber type exposure, no clues to exposure commonly associated with environmental Chrysotile exposures or clues related to occupational exposures of any fiber type. Lung-retained Fiber in Animal Lungs Confirms Environmental Exposure to Naturally-Occurring Amphibole Asbestos in El Dorado County, California Jerrold L. Abraham MD1, Bruce W. Case MD2, Bryan R Burnett, MS3 and Terry Trent, BS
<http://www.upstate.edu/pathenvi/NOTES%20VIEW%20FINAL.pdf>;

DISCUSSION:

The name Libby Amphibole Asbestos was coined (for officialdom) for the fibers of Libby Montana's WR Grace operation in circa 2001. Since the El Dorado County situation regarding Tremolite asbestos, and some of the associated environmental mesotheliomas had been located and made quite public since 1998 prior to this name being coined....and since Jefferson Parish Louisiana had been known for environmentally induced mesotheliomas exceeding Libby's number by 10 times, related to environmental crocidolite asbestos exposures from driveways and roads....EPA sought to isolate and cordon off the Libby fibers, conceptually from all other fibers by naming it Libby Amphibole Asbestos. Thus limiting the various exposures to liability, of a private. public and social nature, presented by these other somewhat embarrassing situations.

Notably Libby was destined to become much more public throughout the United States, than the quiet imposed by CDC on Jefferson Parish, Louisiana, even though the occurrence of mesothelioma was substantially higher than Libby, once again by 10 times. Libby had after all, been the salient proof of what Dr. Julian Peto published in 2009, for many years:

" data convinced most independent scientists many years ago that amphiboles are more dangerous than chrysotile for lung cancer as well as for mesothelioma, and the 1986 EPA report was wrong in its fixed view that there is little difference in hazard. My formal comments to the EPA on that report (attached letter to Dennis Kotchmar dated 13th Aug 1985) are directly relevant to the questions we are now readdressing 23 years later" . Julian Peto

It is now 26 years later. Also, it is worth noting in passing that these "independent scientists" Dr. Peto speaks of, have overwhelmingly supported the notion that the fibers of Libby Montana should have remained named simply "Tremolite asbestos" since the analog winchite, with its 1/2 atom difference can be easily addressed as an analog fiber. There is no evidence that Libby Amphibole fibers or mixture are any more toxic than other Tremolite fiber types and analogs found in the US. There is plenty of evidence that there are other fiber types found in the US that are far more mesotheliomagenic than Libby Amphibole. There is no evidence that suggests that taking it slowly in the IRIS scheme, by addressing Libby Amphibole by itself, will lead to anything other than the current miasmatic mess created by the "all fibers are equal" doctrine held by EPA for all these years.

Similar to Jefferson Parish, El Dorado County had been "handled", mostly, then became an essentially dead topic by the EPA's formal announcement at the 2002 Oakland Asbestos Conference, by the then lead El Dorado employee Mr. Arnold Den, that "There is no Tremolite asbestos in El Dorado County". An odd announcement since "all fibers are equal". Further "handling" of the situation in El Dorado County was later planned and executed by Dr. Jill Dyken of ATSDR in the form of a Health Consultation, insuring, except for one irritation caused by one Peer reviewer, Mr. Robert French, who found out too much information then withdrew his approval of the Health Consultation. However, the situation of El Dorado was still easily handled by EPA in spite of a completely failed Health Consultation, with no protections installed at all, among a political and residential population who did not want to understand or implement any change. El Dorado and Jefferson Parish exhibit conclusively that a regulatory or IRIS scheme that combines all fibers types is doomed to failure. Emphasis in IRIS is required on those exposures to fibers of high disease causing potential.

So here you sit at the long awaited moment when the errors that Dr. Julian Peto spoke of above might otherwise be addressed in their entirety. Hobbled by a charge to address Libby Amphibole Asbestos only. No obvious discussions of the important fiber type, fiber length and time from exposure that apply to all fiber types. Yet you know little or nothing about Crocidolite in Jefferson Parish. Only a small handful of you know anything about Tremolite deposits in California. May not know of Dr. Robert Wagner's experiments with Erionite from Rome Oregon. Maybe not much about Metsovo, New Caledonia, Various exposures of various fibers in Turkey, Crete, Cyprus, Italy, Australia, New Zealand. You most likely do not know that El Dorado County Chrysotile behaves completely differently when released from its place of origin, than does El Dorado County Tremolite....and so too does Metsovo Tremolite and Turkish Erionite.

You may not know that environmentally in California nearly 100% of all asbestos control resources are spent on Crysotile asbestos (in part due to the differences in behavior of fiber types once released into the environment). This resulting in a measurable increase in deaths that would otherwise be easily averted. You have a charge in front of you that is the result of a long period of meticulous manipulation, conducted across the United States, that insures, by limiting the topic to Libby Amphibole Asbestos alone, that the errors of 1986 are not addressed in any meaningful way.

Ladies and Gentlemen, there were 2,626 people in Libby Montana in the year 2000, and has not grown since. There are 300 million residents in the US who require various increased protections from amphibole type asbestos. Granted there are likely millions of homes in the US that contain Libby Amphibole Asbestos....but EPA has no serious intention of breaching this subject with these home owners or associated workers. The entire town of Libby could be dropped into the middle of El Dorado County California and no one would even notice. The five counties I am aware of in California where Tremolite exposures continue unabated, have hundreds of thousands of people who encounter these exposures on a regular basis. (even the much larger exposures referred to in the El Dorado County Health Consultation). Then there is Jefferson Parish Louisiana and Crocidolite, Chicago and Tremolite...on and on throughout the United States.

In short, you are sitting with the biggest darn Elephant in the Room that is currently available in asbestos studies. That Elephant, according to your published charge, is to be completely ignored by all of you. Personally, I would have none of it. I would walk away and insure that EPA and everyone in the public knew why I was walking away. But then my livelihood, reputation, and future prospects do not depend upon playing along. There is however, that one nagging example of Mr. Robert French, Peer reviewer in El Dorado County, who did exactly as I say I would do, when he discovered how he had been manipulated.

In closing I would like to say that I would have vastly preferred discussing future controls and regulations for various asbestos fiber types. diameter and lengths and why and how that importantly relates to the physical behavior of these fibers in the environment. Also, environmental exposure to amphiboles and erionite and the mesotheliomas produced by these exposures, which are destined to be a much greater topic over the next 50 years. But none of that type of discussion can be incorporated into any critical thinking until that elephant of fiber type, not just Libby Amphibole Asbestos, is discussed and changed in IRIS. All such discussion amounts to and results in, with the absence of serious fiber type regulation change, is the next level of error in asbestos science.

Thank you,

Terry Trent

