

Comments for SAB EPA Toxicological Review of Libby Amphibole Asbestos

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Non-Cancer Endpoint: Chest Pain caused by Pleural Plaques

Draft states pleural plaques have ragged irregular edges

- No reference is given to support this statement
- Pulmonary pathology reference books state the opposite

Non-Cancer Endpoint: Chest Pain caused by Pleural Plaques

Two references given to support chest pain is caused by pleural plaques

- Mukherjee et al., 2000
 - States the opposite
 - Not listed in section 7 references
- Bourbeau et al., 1990
 - Does not deal with chest pain

Non-Cancer Endpoint: Chest Pain caused by Pleural Plaques

Summary paragraph Page 5 - 21

- Concludes pleural plaques:
 - Cause chronic chest pain
 - Used as an endpoint for RfC derivation

SAB should recommend to EPA

- Remove chest pain caused by pleural plaques as a non-cancer endpoint
- Eliminate pleural plaques as an endpoint for RfC derivation

Tremolite Asbestos – In vivo animal studies

- Nine (9) studies cited in draft
- LAA contains only 6% tremolite
- Unscientific to compare toxicity of tremolite to LAA
- SAB should advise EPA that direct comparisons of tremolite and LAA be removed from draft

Comparative in Vitro Studies

Six (6) Studies compare reactivity and toxicity of LAA to crocidolite and amosite

- In all studies the LAA is less reactive and causes less DNA and gene damage when compared to crocidolite or amosite
- SAB should advise EPA to clearly emphasize that LAA is less toxic than other amphibole asbestos