

Comment to EPA-HQ-OPPT-2017-0319

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The Environmental Protection Agency (“The Agency”) asks whether the proposed collection of information is necessary for the proper performance of the Agency. We believe it is. The amount of harmful asbestos in our public buildings poses a substantial risk to the general health and welfare of American citizens. To properly address this, the Agency must continue to draft a model accreditation plan (MAP) for each state relating to asbestos inspections. There is still a substantial amount of asbestos-containing material in the country’s public schools and buildings, and the mismanagement of this material can lead to long-term harm to human physiology.

Asbestos was used to insulate pipes and walls in many buildings built before 1980. It was used in over 130,000 private and public schools, largely found in vinyl floors and insulation. (EPA Needs to Re-Evaluate Its Compliance Monitoring Priorities for Minimizing Asbestos Risks in Schools, pg 1). In a 2015 investigative report, 20 states reported that two-thirds of their total 5,309 local education agencies (LEAs) still contain asbestos. (Op-Ed: One-third of American schools still contain asbestos. That’s unconscionable, *LA Times*). There are roughly 180,000 LEAs in the United States. In doing a little math, we determined that roughly 20% of LEAs in the United States, that we know of as of 2015, contain asbestos. This number could most certainly be higher, considering that over half of the states did not respond to the investigative report. In Philadelphia, a 2018 study found over 10 million asbestos particles in a single room. (Despite recent cleanups, Philadelphia schools still expose kids and teachers to asbestos, *The Inquirer*).

The prevalence of asbestos in schools poses a major risk to both students and faculty. Asbestos fibers are released into the air by the disturbance of asbestos-containing materials during building maintenance, repair, and remodeling. Asbestos-containing materials also deteriorate over time, releasing the asbestos fibers into the air and posing a threat to public health. (Asbestos in Schools: A Guide for Parents & Administrators). Many school buildings are old; therefore, the risk of these materials deteriorating and releasing harmful fibers into the air requires proper management to ensure children and faculty are not harmed.

Children are at a higher risk of exposure. (Asbestos in Schools: A Guide for Parents & Administrators). Early childhood exposure allows for a longer period of latency. The effects of asbestos fibers are not seen until years after exposure. Furthermore, the risk of exposure is higher among children for the following reasons: children are more active, children breathe at higher rates, children breathe through their mouths more often than adults, and children spend more time closer to the floor where asbestos fibers can accumulate. (Asbestos in Schools: A Guide for Parents & Administrators). Some of these children will also go off into industries that use asbestos-containing materials, and the early childhood exposure will exacerbate the occupational exposure, worsening the impact of asbestos fibers on their body. If we can better manage asbestos-containing materials in school buildings, we can protect children from worsened harm in their future.

Exposure to asbestos fibers can cause serious respiratory harm, including illnesses such as mesothelioma, lung cancer, and asbestosis. In a retrospective study from 2018, the researchers analyzed medical records, clinical files, autopsies, and histological reports of 188 subjects who died from asbestos-related diseases between 2000 and 2017. (Impact of Asbestos on Public Health: a Retrospective Study on a Series of Subjects with Occupational and Non-occupational

Exposure to Asbestos during the Activity of Fibronit Plant). The study divided exposure into three categories: occupational, neighborhood, and household. They found, overall, that the most frequent cause of death was mesothelioma (80%). They also found that “all 73 cases without occupational exposure, and therefore exposed to low doses of asbestos, died from mesothelioma.” (*Id.*) A person can be harmed by asbestos fibers even if the exposure is limited, like that of children and faculty in schools.

Proper performance of the Agency requires that the Agency draft a MAP for asbestos inspections. We know the harm of asbestos fibers to human physiology, but we do not know the effects that the deteriorating material has already had on children in public schools. Since the latency period of asbestos-related diseases is often long, we may not see the effects until much later. With proper Agency management in place, states will have the proper means to prevent this harm from occurring and keep our children safe.