

# **BREAST CANCER ACTION**

July 10, 2014

Mr. Mark Seltzer  
Document Control Office (7407M)  
Office of Pollution Prevention and Toxics (OPPT)  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460-0001

Re: Hydraulic Fracturing Chemicals and Mixtures Advance Notice Of Proposed Rulemaking  
Docket ID EPA-HQ-OPPT-2011-1019

Dear Mr. Seltzer,

Breast Cancer Action is a national, feminist grassroots education and activist organization working to end the breast cancer epidemic. Our mission is to achieve health justice for all women at risk of and living with breast cancer.

Nearly a quarter of a million women are diagnosed with invasive breast cancer each year, and each year 40,000 women die of the disease. While more women are being screened and slight improvements in treatment have been made, breast cancer incidence has increased steadily over the past several decades. In the 1960's, a woman's lifetime risk of breast cancer was one in 20; today, it's one in eight.

Over half of women diagnosed with breast cancer in the United States have no known risk factors. With family history accounting for only 5 to 10 percent of breast cancer diagnoses, a large and growing body of research indicates that toxic chemicals may increase our risk of developing the disease. In 2012, the President's Cancer Panel reported that "the true burden of environmentally induced cancer has been grossly underestimated [and]...the American people—even before they are born—are bombarded continually with myriad combinations of these dangerous exposures."

Breast Cancer Action is committed to reducing the involuntary exposures to toxins in the environment that are linked to breast cancer. Mounting evidence from experimental, body burden and ecological research indicates that there is a connection between environmental factors and breast cancer.

The practice of hydraulic fracturing, or "fracking" is a growing source of air pollution and water contamination via the chemical substances and mixtures that are used to extract oil and gas from deep within the earth. We know that hundreds of chemicals are commonly used in the practice of drilling and fracking for oil and gas across the country, and of these, dozens are known or suspected carcinogens or endocrine-disrupting chemicals such as Benzene, Acrylamide, Ethylene Oxide, Bisphenol A, formaldehyde, lead, and Di (2-ethylhexyl) phthalate, which are linked to a range of diseases and disorders, including increased risk of breast cancer. The long-term health impacts of fracking cannot be fully studied in large part because of the fracking industry's unwillingness to voluntarily and transparently disclose the chemical

recipes used in fracking operations. Without a federal regulatory mechanism (TSCA section 8(a) and/or section 8(d)) to require comprehensive disclosure of all chemical substances and mixtures used during the process of fracking, professionals, and activists in the public health field are left to piece together existing data in order to study the impacts that fracking has on health.

The EPA must require that fracking companies report comprehensive information about all of the chemical substances and mixtures that are used in process of fracking, and this information must also be disclosed in a timely manner and an accessible format so that researchers and the public can fully assess and understand full scope of risks and impacts that the fracking industry poses to public health. Nothing less than strong reporting and disclosure requirements will suffice – the public must have access to comprehensive information on what chemicals are already, or could potentially, pollute the air we breathe and contaminate the water we drink.

Reporting and disclosure requirements from the EPA are a necessary first step toward enacting the common-sense regulatory measures that are so sorely needed with regard to the expanding fracking industry. However, compiling data on the toxic and hazardous chemicals that are in our environment and bodies and impacting public health is only useful if we also take steps to reduce these toxic exposures. I look forward to working with the EPA as well as legislators to achieve the ultimate goal of reducing diagnosis and death rates for breast cancer, as well as other diseases and disorders associated with exposure to chemicals used in the fracking process. To do so we must take action to reduce and eliminate exposure to toxic and hazardous chemicals in the first place.

Breast Cancer Action's position on fracking and the urgent need for requirements on reporting and disclosure are based in our belief that fracking is a public health concern for everyone, because the growing fracking industry is capable of poisoning and polluting the basic necessities of life: our air and water.

Thank you for opening period of public comment on chemicals and mixtures used in the fracking process, and thank you in advance for your consideration of Breast Cancer Action's comments on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Karuna Jaggar". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Karuna Jaggar  
Executive Director