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Asbestos in Paints, Roofing

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Johns-Manville **Internal Correspondence**

Date January 20, 1976

To Memo to File

From A. J. Holberg - R&D

Copies See Below

Subject NPCA ACTION ON OSHA REQUIREMENTS FOR OCCUPATIONAL EXPOSURE TO ASBESTOS-RULEMAKING
October 9, 1975

Summary

The National Paint and Coating Association, Washington, D. C., have a task force to develop documents of comments to OSHA on proposed rulemaking as related to the industry. This task force wished input from the members of the steering committee on roof coatings and sealants manufacturer members relating in particular to, "Notice of Proposed Rulemaking, Occupational Exposure to Asbestos", dated October 9, 1975, Department of Labor, OSHA.

The NPCA document is to be filed with OSHA on or before February 9. A draft will be sent to members of the steering committee before, then for comments.

Primary conclusions reached by the nine members present, (a) including representatives from Koppers, Gibson-Homans, Tremco, Tropical Paint, Dab Caulk and Colonial Paint were:

(1) There is no known available substitute for asbestos in oil or solvent base coatings, seals and caulks. This has been found to be true even if the cost of the asbestos substitute tried was 4 to 20 times higher. (Hair was considered somewhat effective.)

(2) OSHA knowledge of the industry is very limited.

(3) The 8 hr average proposed standard of two fibers per cc would seem to be acceptable. Further lowering as proposed to 0.5 fiber per cc would be completely unacceptable to the industry because of high cost of investment for compliance.

(4) The necessity of lowering even to two fibers in this particular industry was thought unnecessary. Respirators

(a) A listing of all members present will be supplied by NPCA.

commonly are worn during the limited time of possible exposure as may for 30 min per 4 hr batch time.

(5) The proposed standard in no way refers to the end product application and usage, but only to possible exposure to asbestos in manufacture.

Discussion by Members

The discussion was led by Richard Murray, Assistant Technical Director.

The time for comments to OSHA has been extended to February 9. Comments of NPCA will take the form of those prepared for OSHA on Docket ECP-I, "Proposed Exposure Standards-Toxic Substances and Ketones", see copy of page of contents attached. The draft from NPCA should be commented on as soon as possible.

Of the possible substitutes Mineral Wool was mentioned. But would the same problem arise with OSHA if such a fine fiber would be used?

Gibson-Homans representative, Eric Wormser stated they had tried to find a substitute for at least 15 yr, (their firm has marketed bituminous based roof coatings over 60 yr). Their development work the last 2 yr has been most intensive. Their work is continuing. His estimate was that 150 million gal of roof coating is used annually. (70,000 tons asbestos, my estimate.) Other members generally confirmed their findings. One member stated he knew of returned truck-loads with asbestos substitutes because of durability failure. The success attributed to asbestos in solvent or oil bases coatings or sealants was the "tight bond", and web effect in contributing to application properties, and to long time durability and integrity of protection.

The reply document of NPCA thus, would be based on uniqueness short term exposure time, use of respirators, importance of industry, and knowledge of medical problems in the industry. Gibson-Homans stated that out of last 85 tests the two fiber standard was met 64 times; and the 0.5 standard met 33 times. This was based on a 30 min sample time. The 8 hr time is considered impractical with present equipment.

The long time medical record proposed by OSHA was considered impractical. (47658)

Comment was made that J-M had been approached on wetting fiber with 25 percent by weight of mineral spirits, but did not consider feasible.

The TLV level as the action level concept is being challenged. A training and information program by all is considered desirable.

Action by J-M From Observations of AJH

(1) Consider cam usage in black line products. No immediate solution without testing for durability seems available if substitutes are to be considered.

(2) Advice to coatings industry. Improved equipment for handling pressurized and block types of asbestos should be available (probably is already), or made available.

(3) Reconsider prewetting of J-M asbestos, either as marketed or as user can provide in handling equipment for introduction of asbestos.

A. J. Holaday

vaj

Attachment

cc:
R. L. Snow - 582
R. A. Bengtson - 582
R. F. Reinhart - 582
E. N. Penner - 483
W. B. Reitze - 482
E. G. Long - R&D
W. W. Hendry - 283
J. F. Bale - 283
J. H. Sattal - R&D
J. Axelson - R&D
P. B. Shepherd - R&D
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