

AUGUST 22, 1975

MR. R. F. NELSON

DEPARTMENT OF OCCUPATIONAL
SAFETY AND HEALTH - STAFF
INDUSTRIAL HYGIENISTTHERMAL INSULATION

PLAINTIFF'S EXHIBIT

SH-1844

We have reviewed the August 19 letter from Mr. D. B. Luckenbill on this subject. There is no question that many of the concerns expressed by Shell engineers are the direct result of occupational safety and health considerations. In fact, virtually the entire search for non-asbestos insulating materials was precipitated by the revelation that insulating workers suffered frank diseases as a result of exposure to asbestos. This in turn lead to the current OSHA standard on asbestos.

Since insulation is an important technical aspect of our business, representation on the ANSI C-16 committee should be supported. We will be happy to provide the appointee with input on health and safety matters.

In reading over the minutes of the Engineering Insulation Materials Standards and Usage meeting, there are several points that should be raised and emphasized in relation to the health aspects of insulating materials.

First, asbestos, even though it can be a serious health hazard, has not been banned. Arbitrarily excluding asbestos from consideration as an insulating material may not be in everyone's best interests. If, in a given situation, there is a competitive substitute for asbestos that has been reasonably proven not to be hazardous, then it should be used. However, unless there is a clear-cut advantage to non-asbestos materials, asbestos materials should not be automatically excluded from consideration. If we are willing to expend the resources necessary to insure the safe handling, application and removal; the employee relations and public relations; asbestos insulation can be used safely. Once this is understood, then the decision to use asbestos can be based on economic factors.

Secondly, to substitute a material providing marginal insulating characteristics, and for which we know very little about from a health standpoint, is also fraught with potential problems. There is no doubt that as new insulating materials come onto the market we are going to go through a protracted learning period concerning their technical and health characteristics. In fact, for our purposes, it may be that a benefit/risk analysis would indicate some of the non-asbestos insulating materials ultimately may be worse than asbestos insulation.

Sound insulating decisions should be based on the current facts, and reasonable predictions of future health implications. We should not make decisions based solely on the fear of future unknowns.

Original Signed By F. M. Parker III

LAM 025829

F. M. Parker III

cc: Mr. B. W. Dunbar

ABS-016967