suggestions to make regarding the regulations that we hope will be of help to the Board in arriving at a final document that will not only be effective but also practical and reasonable. I will discuss the sections upon which we wish to comment in the order in which they appear in the regulations.

Our first suggestion is with regard to Part II: General Requirements, Section 201. This section calls for the obtaining of a permit to engage in any activity which could discharge asbestos fiber into the environment. We feel that this section is not specific enough with regard to which activities would be covered. As you are probably aware, in the vast majority of asbestos-containing products used in the country, the asbestos is locked in place with cement, plastics or other binding materials, and does not constitute a source of emissions to the atmosphere. Asbestos-cement pipe and vinyl-asbestos floor tile are examples of such products. Other products and activities do constitute possible emission sources, and under the regulation would require a permit. If it would be of help to the Board, the Association I represent would be most willing to prepare a list of those products in common use where the asbestos is in a non-locked-in or loosely-bound state and thus constitute a possible emission source which would require a permit.

As to Section 201, Sub-section B, requiring a satisfactory course of health instruction for employees in those industries involving the handling of loose or loosely-bound asbestos products, I would like to point out that

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