

AIHC

AMERICAN INDUSTRIAL HEALTH COUNCIL

1075 CENTRAL PARK AVENUE • SCARSDALE, NEW YORK 10583 • (914) 725-1492

January 25, 1979

TO: DESIGNATED CONTACTS
STEERING COMMITTEE
ASSOCIATIONS COMMITTEE
ALTERNATIVES COMMITTEE

*PPA
FYE
2) RPT. f
Bureau
Carcinogen
Std - 500
AIHC position*

AIHC TESTIMONY RE GENERIC AIR STANDARDS

Gentlemen:

Enclosed for your information is a copy of the testimony presented on behalf of the American Industrial Health Council earlier this month by Mr. Richard Fleming, Executive Vice President of Air Products and Chemicals, before a meeting of the National Air Pollution Control Techniques Advisory Committee with respect to proposed rulemaking on generic standards for the organic chemical industry.

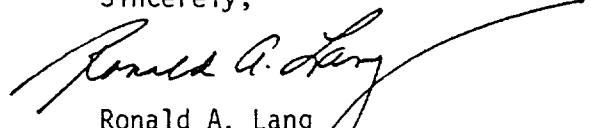
Mr. Fleming's testimony was directed towards recommendations being considered by the NAPCTAC with respect to efforts EPA has underway to develop standards to be applied uniformly to all plants where a toxic organic material is designated under Section 112 of the Clean Air Act. It deals primarily with the control of fugitive sources of hazardous air pollutants and is not the generic guidance document expected to be published by EPA shortly which will consider the broader issue of identification and control of potential carcinogens. Present indications are that that document, which is expected to form the basis of EPA regulatory activities not only under the Clean Air Act but also under water and solid waste legislation, presently is expected to be published by the Agency for comment some time in February.

In the meantime, the Occupational Safety & Health Administration is now reviewing the record established during 1978 in connection with its generic carcinogen standard. There are no clear indications yet as to when the Agency plans to publish a final regulation, but we have been informally advised that such publication is unlikely before late March and could be delayed somewhat beyond that date. AIHC is continuing its informal discussions with a number of Federal agencies involved with developing public policy positions regarding potential carcinogens and their control. These issues are expected to be under substantial debate during 1979, not only within these agencies but also within the Congress, as the government moves towards determination of a national policy in this area.

ALCOA05221

AIHC believes it important that its members continue to discuss the key issues on which this debate will focus, including such matters as determining a sound scientific method for identifying potential carcinogenic risks, for quantifying those risks, for weighing them against the cost to the economy of various control measures and, most importantly, determining just how far the American public wants its Government to go in protecting them from risks. AIHC is prepared to help in this effort by providing materials for individuals from your company who may wish to discuss these issues publicly and, of course, is willing to continue to provide speakers at any appropriate forums, including industry meetings and conventions, radio and TV appearances, trade association meetings, etc. If you know of such opportunities where an AIHC spokesman would be welcome, please get in touch directly with our office.

Sincerely,



Ronald A. Lang
Executive Director

Encl.

7

AIHC Testimony Re:
Generic Air Standards

7