



October 6, 1981

Supply Development and Planning

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Subject: Asbestos Information Assoc.
Conference

For your information.

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Inter Office

Advanced Vehicle Engineering
and Technology

October 5, 1981

MEMO TO FILE:

cc: G. F. Bolling
D. M. McCarthy
K. A. Wheeler

Subject: Asbestos Information Association Meeting - Alexandria, VA - 9/16/81

The following are my notes on the Asbestos Information Association (AIA) meeting held September 16, 1981 in the Alexandria, VA Holiday Inn. The AIA is a trade association of asbestos raw material producers, asbestos product manufacturers, etc., headquartered in Arlington, VA with ties to a similar International Association. AIA holds an Industry-Government Conference annually to bring their members and others up to date on developments in health, regulation, etc.

Federal agencies were the biggest group represented (probably because of closeness to Washington D.C.). Also attending were people from the automotive supplier companies - Bendix, CertainTeed, Rodgers, Armstrong, E. E. Porter and Borg-Warner. Only Ford and GM of the auto manufacturers were represented. GM's representative was W. H. Krebs, who holds a job similar to our Larry Koslowski.

All the speakers were excellent, even though a couple advertised stars sent stand-ins. In fact, the most interesting points made were these:

Thomas Hopkins, Office of Management and Budget (OMB) - Lead off the meeting with review of President Reagan's plans for regulation reform.

- The industry spends billions to comply with regulations and Reagan wants the unnecessary part identified and made available for productivity improvements instead. So, under Presidential order, OMB has taken on a regulatory review function paralleling their budget function.
- The Reagan philosophy is: Consider new regulation only if market forces clearly fail. Then ask why and tailor a solution to the problem. Often the solution is "consumer information" rather than regulation. If regulation is necessary, make it performance rather than via specific design. OMB/Agency arbitration goes to V. P. Bush. New regulations will no longer necessarily favor engineering compliance over personal protective devices.
- He finds that regulations defining specific equipment and control methods tend to wash out the small, innovative manufacturer because of the capital expense to comply.

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- . OMB is likewise reviewing need for existing regulations. Particularly mentioned was the OSHA generic cancer policy.
- . Accomplishments to date are 1/3 fewer pages in the Federal Register and 1/2 of the rules in progress dropped. (Note that Reagan quoted the 1/3 figure on TV 9/24/81.)

Monroe Harris, Johns-Manville V.P. - Talked of Progress in Health.

- . Says that J.M. has reduced dust level to 1 fiber per cc in mining operations and has stopped all manufacture of friable products.
- . Holds EPA and OSHA threats of regulation responsible for J.M.'s decline in business...like 50% in the last few years.

Frank J. Frodyma, OSHA - Talked about what OSHA is doing to implement President Reagan's directives.

- . OSHA will change its adversarial role to a cooperative approach with private industry to regulation writing (sounded a little like theory Z on a government-industry scale).
- . "Must" features of future OSHA regulations are:
 - Side effect evaluations - documented.
 - Cost/benefit basis for regulation - to the extent permitted by law.
 - Evaluate alternatives - personal protective devices may be OK if provide same level of protection as would engineering solutions.
 - Net benefit to society.
 - Regulatory flexibility - special treatment for small business, e.g., stretch out of deadlines.
 - Performance preferred over design.
 - Recognition of recent Supreme Court rulings (Benzene, cotton dust and lead).
- . OSHA policy for future regulations will be:
 - Scientific evidence must show substantial risk, and proof that the standard will reduce risk substantially - Ref. Supreme Court ruling on Benzene.
 - Ordered compliance must be feasible as a whole (meaning some manufacturers might find it impossible to comply, but as an industry, feasible). Ref: Supreme Court ruling on Cotton Dust.
 - Ordered compliance must be least costly alternative.
- . In answer to question, what is happening on proposed reduction in asbestos exposure level to 1 or 0.5 fiber/cc., Frodyma answered: nothing (the proposal stands). But the regulation writing procedure is back to square one, i.e., documenting the risk. Same status applies to 10 or 15 other substances and may take 2 years before new regulations are ready.

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John B. Ritch - TSCA Industry Assistance Office, EPA - Talked about what EPA is doing to implement Reagan's Plan.

- . Ritch reported that the ANPR of October 79/December 79 (Under TSCA) which proposed banning certain uses of asbestos is obsolete. In reconsideration, EPA finds increasing controversy about the risk from brake repair, demolition, etc. and thinks a broader scientific study is needed, e.g., fiber size and smoking. So, a new ANPR seems warranted. However, the next steps - possible cross-agency task force; new rules on how to measure cost, new questionnaire ideas, are waiting to be reviewed with new agency heads, (when confirmations are complete).
- . Answering a question about future regulations on asbestos in waste water, Ritch answered that tests with animals show no hazard from ingestion of asbestos.

Paul Kotin, Retired V.P. for Health, Safety and Environment of Johns-Manville - Lead of panel on update of asbestos and health.

- . Kotin read a draft of his retirement address to the J.-M. President listing his suggestions for research to find the truth of "plural response" to asbestos as a way to end the legal controversy (law suits are argued on bias and conjecture today, he said). His tone was slightly critical of J.-M. Management in that he said none of his research ideas would take more than 20 mos. and could have been started years ago.
 - Clinical history pathology - what does exposure mean to the workers in the industry.
 - Biological changes due to asbestos - do they predict cancer.
 - What is the asbestos exposure to the general public - the background level.
 - Study cigarettes and asbestos - can asbestos cause cancer alone.
 - Does asbestos in water produce G.I. tract cancer.
 - Can purely asbestos-caused cancer be diagnosed.

William Weiss, Professor of Medicine, Hahnemann Medical College - Talked about some of his recent research, mostly analyses of medical studies.

- . He concludes from his own and others studies, that 60 to 90% of lung cancer in the asbestos industry is preventable by simply not smoking.
- . As to why the relationship, it may have something to do with smokers retaining asbestos in the lungs longer. In an experiment in which non-smokers and smokers breathed a magnetic dust allowing the residue in lung to be measured after periods of time, non-smokers purged nearly all dust after 12 mos. Smokers retained a significant amount.

Hans Weill, Professor of Medicine, Tulane University - Spoke about whether we can live with the asbestos risk.

- . Public policy has to start by quantifying the risk in a dose/response plot. Scientists plotting historical data come to conflicting conclusions because of uncertainty of interpreting older measurements. Weill finds that his most reliable data tell him that it's uncertain with 95% confidence that there is a threshold - but doesn't exclude the existence of a threshold does at which risk is no greater than general population.

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- . Because of decreasing exposure in the last 15 to 20 years, asbestos caused pleural plaques are blending into the noise background of cigarette and other environmentally caused disease.
- . Finding new evidence that fiber type is a factor in mesothelioma and that this disease might also be caused by other minerals (reference to some village in Turkey where mesothelioma occurs commonly, and where no asbestos could be found).

Gary J. Nash - Industry, Trade and Commerce, Government of Canada - Opened a Presentation on Canada's feeling on the future of asbestos.

- . Nash announced that a world symposium on asbestos, health and society will be held May 1982 in Montreal. Purpose will be to bring to regulators from all parts of the world, the latest evidence on what is/is not a safe level of exposure. Symposium will touch on substitutes, economics, etc. Attendance will be limited to only 600 with 150 seats for industry. Attendees to this AIA conference will receive notices of the meeting.

Jacques Dunnigan - Institute for Research and Development on Asbestos (IRDA), University of Sherbrooke, Quebec - Talked of Canadian health research.

- . He believes the future of the asbestos industry depends on proving to the general public that asbestos is as safe as he believes it to be which is: exposure to a workplace concentration of 2 fibers/cc equals 1 cigarette/day. He believes that labor is now satisfied with safety controls.
- . He is convinced that hazard of raw asbestos no longer exists, after "locking up" the fibers in a mixture as in asbestos cement (A/C). He quoted from a study in which asbestos filled thermoplastic was machined and the dust analyzed. Zero to very small amounts of unmodified asbestos fiber were detected in the dust. (Further work might show brake wear material not cancer causing).
- . He says researchers are finding that treatment by milling or phosphating "pacifies" the biological effects. Treated asbestos shows a unique spectrographic signature.

Daniel Perlstein, President - Quebec Nationalized Asbestos Industry.

- . The Quebec government created its own asbestos industry 3 years ago, has invested \$50 million, now employs 1200 people and has opened a new friction materials plant to manufacture brake pads. They are betting that future will show no excessive risk in mining or use and will take up the production lost by U.S. suppliers.
- . Said that asbestos products are today effectively outlawed by regulation in Denmark, Sweden and Germany. He believes this to be partly economic since their regulators are vague on evidence of a problem and these countries have no commercial asbestos. Accordingly, he intends to price his product low.

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- . His company is doing a lot of work on phosphating of asbestos fiber for textile and paper. Says it's cheap and easy to do by gas impregnation. To verify its worth, he has a biological test to compare relative toxicity of modified asbestos and asbestos substitutes against the raw product.

Other speakers were:

- . D. Elliott Wilbur, Jr., V.P., Arthur D. Little, Inc. and an expert on the construction business. He pointed out that construction is the biggest user of asbestos products particularly A/C pipe and sheet, which are excellent products as a business and as a desirable material. He berated the manufacturers for not making these products more attractive as they are losing out to less durable steel and plastic.
- . Senator John H. Chafee, Republican from Rhode Island. He says that Congress will vote on a Clean Air Act probably early next year. It's in the hearing stage now. Whatever it is, he favors Federal funding for a maximum of 55% for waste treatments, etc. vs. current 75%. More local participation assures fewer frills. He said that members of Congress can only act when people cite specific problems, not generalities.
- . Representative Eugene Johnston, North Carolina. He explained, very enthusiastically, Reagan's plan to make more capital available to increase private sector productivity and growth and to stop the spend/tax/spend/tax habit of Congress by cutting taxes first. Says nothing worries Congress more than having to fund new programs in the face of a deficit, unless its to raise taxes.


R. A. Husen

/ksh

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1. Team develops future (anticipated) reqs from EPA, OSHA, IRLG, CPSC. (See Frey letter)
3. Products Containing Asbestos
Verify VME Data
5. Total asbestos processing ash. - 22.2 %
6. Total asbestos accumulating ash. products
7. Major suppliers of ash-containing prod. or raw mat.
8. Supplier compliance capability
-- Contact suppliers. First contact VME.
9. Ford compliance capability
-- Have VME Staff verify ability to comply
Do they agree with OSHA position
10. FPS D Impact
Applicability of regs. to aftermarket (disposal, etc.)

CPSC Consumer Products Safety Comm.
IRLG Emergency Response Team Group

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