The Illinois Department of Labor also adopted procedures for enclosure and cleaning of construction sites, on which asbestos is sprayed. These procedures were intended to protect the health of workers on the site, although their effect, if pursued, would be to reduce emissions to the ambient air. The record shows that such procedures are cumbersome, seldom obeyed to the letter, difficult to enforce and insufficient when obeyed to protect the public beyond a construction site. Hence, we have banned asbestos spraying. Again, the impact which this Board's decision exerts on the actions of another state agency is made necessary by our mandate to protect all members of the public from air pollution.

A similar ban on spray asbestos has already been taken by the Cities of Chicago (effective January 1, 1972), and New York, and is being considered by several other cities.

In consideration of the foregoing factors, the Board submits a comprehensive regulation for asbestos controls. To this end, the regulations identify the significant contributors of asbestos as the commercial use of asbestos in construction work; the demolition of asbestos-containing structures; the manufacturing and processing of asbestos-containing products; the transportation of certain asbestos-containing products; and the disposal of asbestos-containing waste. The use of asbestos in brakes, while originally included as a subject of control, will be deferred for the time being.

Part II of the regulations imposes several general requirements upon all commercial construction, repair, alteration, demolition, manufacturing or processing activity from which asbestos fiber is discharged into the ambient air. The persons responsible for manufacturing activity must obtain a permit from the Environmental Protection Agency. The permit system will serve to produce the advanced assurance of compliance with the applicable control regulations and will thus reduce the cost and burden of in-the-field enforcement.

In addition, these commercial activities must provide facilities to prevent the removal of asbestos fibers from the site of such activity on the clothing of employees. Indeed, this poses a rather new concept of air pollution control. Those who have died from lung ailments induced by long, close association to an asbestos worker may be powerful proof of the need for novelty.

Finally, the Regulation would provide for careful waste disposal procedures, as wind-blown refuse heaps and scrap piles contribute to the volume of asbestos fiber in our air. The simple steps for control eliminate any excuse for such dangerously sloppy housework.