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BRAND INSULATION INC.
2350 W. FULTON STREET
CHICAGO, ILL. 60612

February 11, 1972

EXHIBIT
Brand 21
EB 2-4-13

Office of Safety & Health Standards
400 First Street Northwest
Room 305
Washington, D. C. 20210

Re: Proposed Standard For
Exposure to Asbestos Dust

Gentlemen:

As thermal insulation contractors in the construction industry and being effected tremendously by the above standard, we are herewith submitting comments in accordance with notice published in the Federal Register, Volume 37, No. 7, Wednesday, January 12, 1972.

Current thermal insulation specifications, particularly those applicable to industrial, utility and Corps of Engineer process work are replete with reference to material containing asbestos. The asbestos is primarily evident in cements which are converted to a workable consistency after mixing with water at the construction site and in rigid, preformed sections of insulation as a binding agent. Thus it is obvious that the following is unavoidable: (a) asbestos fibres are or can be airborne immediately upon opening a bag of cement, and (b) any handling, cutting, trimming and fitting of the preformed sections of insulation also precipitates these free particles. Consequently, pertaining to the above notice;

Paragraph e, warning signs would surround each construction site on which asbestos containing material is used.

Paragraph f, all persons engaged in employment of a construction site so posted must be monitored.

Paragraph d (6), as the dust would be ubiquitous, complete vaccua cleaning of a posted construction site would be a daily occurrence. This monstrous task would be a nightmare and totally unfeasible. Alternately, enclosures to capture dust are equally unfeasible.

Minimally, these actions would generate costs incalculable, yet STAGGERING. There is no criteria available for determining how many tradesmen will be subject to airborne asbestos dust. Likewise, this cost responsibility must be assigned. i. e. shall each contractor incorporate his amount as part of his bid? Or, shall only those contractors using asbestos entrained material be liable?

If so, in what proportion? Ridiculous? Only if this standard is hyprocritical.

As opposed to further cost accruing examination of other paragraphs in the above notice, we submit the following:

A. Substitute asbestos type cements with other types if possible. Another alternative would be the employment of a mineral wool or fiberglass wrap finished with either a poly-vinly-chloride (PVC) jacket or metal jacket. This is being done presently, but only on a relatively small percentage of construction.

B. In lieu of using pre-formed insulation which has the asbestos binder, substitute fiberglass on temperatures below 450°F. and mineral wool on temperatures above 450°F.

C. The education of persons engaged in specification writing and cooperation of insulation manufacturers whereby effort will be expended to the end of the availability of new products is also necessary.

Finally, construction work in progress, which is not exempted by the standard, it still another entity. The same cost proportionately are involved, however immediate. As these additional moneys are not reflected in current contract amounts it is financially impossible to absorb this. Even if it was, it would be grossly inequitable.

Inasmuch as the construction industry is confronted with this momentous challenge, coupled with the fact that normally the insulation contractor commences work approximately six (6) to nine (9) months after a given construction project gets underway, we feel the committee should be advised to consider an extension of time before enactment of said standard. Hopefully, at the very least, it would take many months to assemble the data required in order to assess this additional cost burden to the insulation trade alone. We cannot intepret the standard with regard to its effect on the other trades, but it is pointed out here that several others are possibly involved. With all due respect to the authors of the standard, some of whom no doubt include industrial hygienists and medical doctors, the construction industry is unique, compounded with even further specialization within the industry. As can be readily seen, a task so comprehensive cannot be accomplished in a few weeks.

We appreciate this opportunity to apprise the committee of our situation, but it is also our duty to submit this presentation.

Very truly yours,