FILE NAME: Asbestos in Hair Dryers (HD)

DATE: 1979 Apr 23

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DOCUMENT DESCRIPTION: Johns-Manville Letter to Gillette Co. RE CPSC Special Order and J-M Internal Testing Results

Johns-Manville Corporation

Ken-Caryl Ranch
Denver, Colorado 80217

Paul Kotin, M. D.
Senior Vice President
Health, Safety and Environment

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PRESIDENT'S OFFICE
APR 25 1979

April 23, 1979

4/25 6:30pm

Mr. Stephen J. Griffin, President
Gillette Company
Appliance Division
Prudential Tower Building
Boston, MA 02199

Dear Mr. Griffin:

As a result of a petition filed by the Environmental Defense Fund, the Consumer Product Safety Commission is investigating the possible hazards of portable hand-held electric hairdryers containing asbestos paper insulation.

We are aware that CPSC sent a Special Order to your company on March 29, requesting certain information on these products. Then on April 20, the CPSC sent letters to certain manufacturers requesting that the sale of hand-held hairdryers containing asbestos paper be discontinued and further requesting the recall of all such products already sold.

On March 29, 1979, the Johns-Manville Industrial Hygiene Laboratory commenced a series of tests to measure the levels of asbestos fiber emission from hand-held hairdryers containing asbestos paper insulation. The purpose of these tests was to verify the accuracy of the data from EMV Associates, which was the basis for the Environmental Defense Fund petition, and to determine whether the continued use of hairdryers containing asbestos paper will pose a health hazard to anyone.

We believe that your company will be interested in carefully reviewing the data and conclusions obtained from our studies. Therefore, I am enclosing a copy of our April 10, 1979 report which has been forwarded to the Consumer Product Safety Commission and the Environmental Defense Fund.

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Briefly, our report reaches the following conclusions:

We conclude from our review of the EMV Associates data, as well as from the results of our own studies, that asbestos fibers released incidental to the usual use of hairdryers create no health hazard. This is entirely compatible with epidemiological data derived from persons exposed to ambient concentrations of asbestos in non-occupational and non-paraoccupational environments.

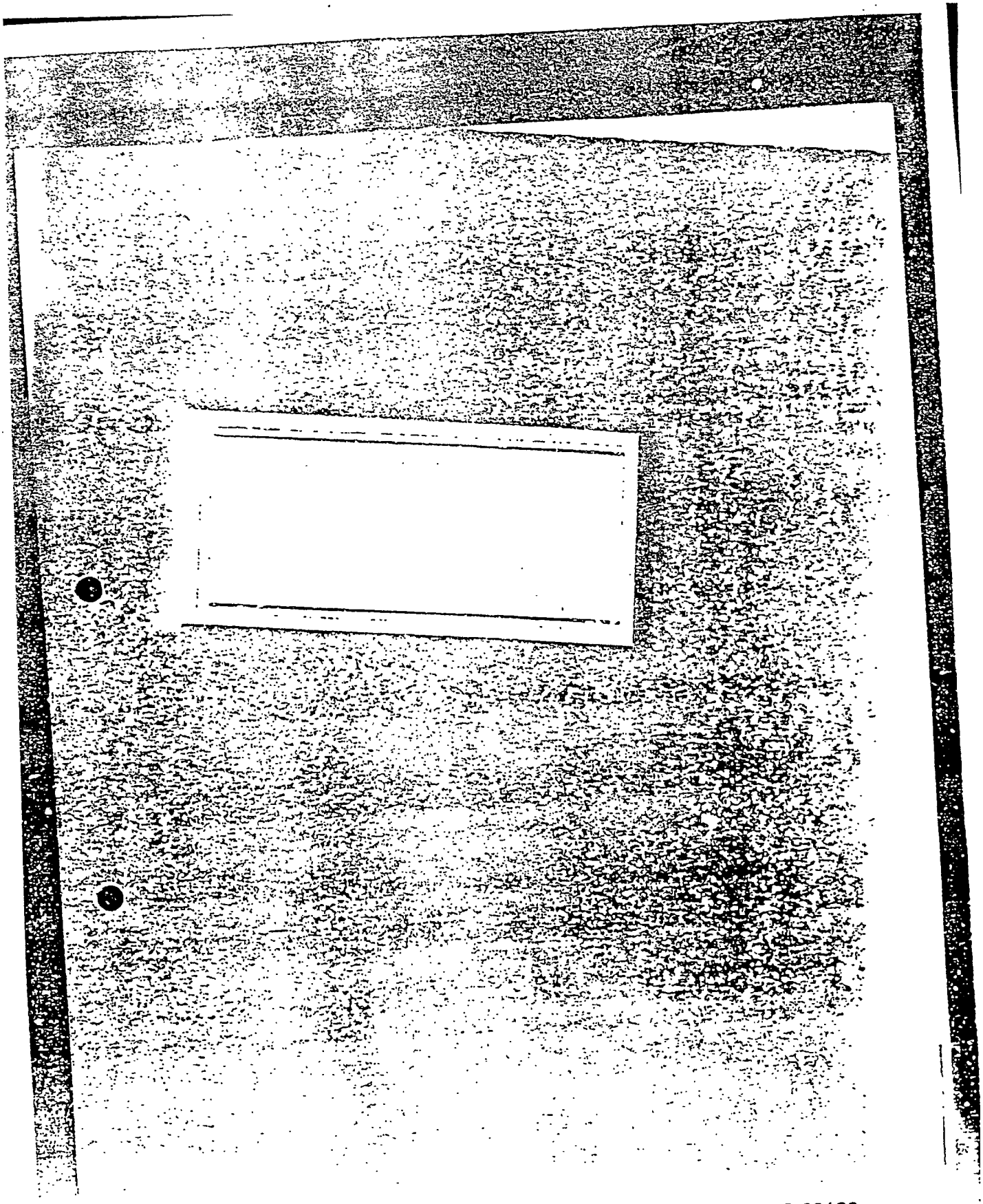
The absolute numbers in the Environmental Defense Fund's petition and in Johns-Manville's study are meaningless from a health hazard point of view. What is meaningful is that small numbers of asbestos fibers are being observed and that most of those are either non-respirable or too short to be biologically active. The evidence suggests that the EMV results overstate the mass of asbestos emitted by hairdryers. Furthermore, even the highest airborne fiber levels that can be calculated using even unrealistic assumptions (e.g. all fibers remain airborne) predict airborne fiber levels orders of magnitude below current permissible exposure levels pursuant to OSHA's standard for occupational exposure to asbestos.

It must be recognized that there is no evidence to indicate that the use of hairdryers containing these asbestos papers poses a health hazard to anyone. The fiber concentrations emitted are, in fact, consistent with those found in urban environments for which there is absolutely no evidence of risk. However, in view of the intense concern evidenced by consumers as to this use in a personal care product, manufacturers should consider whether continued use of loosely bonded asbestos paper in hairdryers is appropriate.

We urge you to circulate our report to the appropriate individuals within your company for careful review and consideration before making any final determinations. In addition, you may want to conduct your own studies.

If you or your staff have any questions regarding our attached report, please contact me.

Very truly yours,



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