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John Boye

cc: Board of Directors

DEPARTMENT OF INDUSTRIAL RELATIONS

DIVISION OF INDUSTRIAL SAFETY

455 GOLDEN GATE AVENUE
SAN FRANCISCO

ADDRESS REPLY TO:
P.O. BOX 803
SAN FRANCISCO, CALIF. 94

February 7, 1967

Mr. J. P. Verhalen, President
Sprayed Mineral Fiber Manufacturers
Association, Inc.
Suite 2300, One Wall Street
New York, New York 10005

Dear Mr. Verhalen

Our Division of Industrial Safety, in conjunction with the State Health Department and the U. S. Public Health Service has, over the last three years, made extensive studies into the hazards of asbestos because of the emergence of a full-fledged asbestos industry in California.

The MAC for asbestos in our General Industry Safety Orders is 5 million particles per cubic foot, this to be measured by the method recognized by the U.S. Public Health Service. This has been the standard light field technique. Recent studies by the U. S. Public Health Service, using electron microscopy and dark field microscopes with phase contrast and higher magnification, identify particles of chrysotile down to less than 0.01 micron in diameter. In typical air samples, more than 90 per cent of the particles counted would not be visible using standard light field techniques.

For at least ten years, evidence has been accumulating relating lung cancer to asbestosis, and in the last few years a serious increase in mesothelioma among asbestos workers has been reported.

We have made studies in much the same manner as the Ohio Division of Safety and Hygiene with similar findings; we also require the use of approved dust respirators by the exposed workmen. We have also had injuries from slips and falls caused by the slippery, wet material which plops to the floor.

We have not found serious asbestos dust concentrations resulting from the wet "spraying" operation, one reason being that the building is not enclosed at this time.

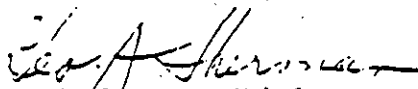
We do consider dry sweeping of this material in an enclosed building to be potentially hazardous. The USPHS has studied this operation using phase contrast, higher magnification and dark field lighting and in personal discussion, has indicated they find very high concentrations of small particles. So the immediate cleanup operation is important in our view, for both reasons.

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We appreciate your concern that "unnecessary cautions" work a hardship on industry. We want controls which will provide for a reasonable level of safety for employees. There has been considerable misinformation about asbestos dust in recent years. Examples are the correlation between asbestos bodies and asbestosis, and the misconception that only 20 micron particles and larger cause asbestosis.

We hope you are well aware of these matters. The correct answers are important to you and to us, and most important, to the exposed individuals.

Very truly yours


Geo. A. Sherman, Chief

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- cc Mr. J. A. Cinquemini, Executive Secretary
Los Angeles Building and Construction Trades
Council
1626 Beverly Boulevard
Los Angeles, California 90026
- cc Mr. V. C. Mathis, Assistant to Executive Secretary
Los Angeles Building and Construction Trades
Council
- cc Mrs. Margaret R. O'Grady, Deputy Director
Department of Industrial Relations