HILL AND KNOWLTON, INC

MEMORANDUM

March 5, 1971

Subject: Report on the Appearance of Dr. I.J. Selikoff Before the New York City Council Committee on Environmental Protection, February 26

The Council held a special Executive Session to hear Dr. Selikoff's testimony concerning the total ban on sprayed asbestos included in the proposed New York City Air Pollution Code. An official transcript, if available at all, will not be available for several weeks. In the meantime it is desirable that Dr. Selikoff's views on this subject be generally known and understood.

He began by complimenting the personnel of the City Environmental Protection Administration for drawing up a thoroughly excellent code which would undoubtedly serve as a model for other cities. After favorable comment on a few specific provisions, including the control requirements on sprayed insulation materials other than asbestos, he said he felt compelled to "voice misgivings" about another provision which, though excellent in intent, would set a dangerous precedent. He objects to the ban on asbestos in sprayed insulation for philosophical reasons, in a sense. His approach to problems of occupational and environmental hazard has always been that control is better than prohibition. He cited several examples: Radiation is a hazard, but we do not ban X-rays on that account, we control the hazard. Automobiles emit carbon monoxide, but we do not ban autos, we try to control the emissions, etc.

Applying this approach to sprayed insulation materials, including asbestos, he said that such controls should be as rigorous as necessary, regardless of the cost to the contractors. They should be required to meet the standards or go out of business. "Put them out of business, if necessary." But do not ban the use of asbestos, because it could lead to the banning of other materials. "One substance after another could be banned."

In response to many questions by members of the Committee, he always skillfully returned to this theme. Asbestos dust is an occupational health hazard and, before controls were instituted, the spraying of asbestos insulation did produce high and possibly dangerous levels of dust in the air around construction sites. However, his group had monitored such sites after the spray regulations had been imposed last year and found that the air in the neighborhoods contained only the normal, "trivial" amounts of asbestos.

Selikoff drew on his experience in working with industry, pointing out that industry can be expected to cooperate in instituting adequate controls of hazardous substances. On the other hand, a proposal to prohibit the use of an industry's product will meet with nothing except total opposition.

Committee Chairman Theodore Weiss said he was somewhat confused at Selikoff's opposition to the proposed ban on sprayed asbestos because proponents of the ban had cited Selikoff's published studies to prove that asbestos dust is a health hazard. Selikoff explained that these studies pointed to an occupational health hazard among insulating workers, and this hazard certainly applies to the men engaged in asbestos spraying, although he had conducted no studies among this group. "When we looked at asbestos spraying we found the dust levels very high. Everybody engaged in the operation was at risk." In future years, the mortality among these men will be very bad because, "the inhaled asbestos will stay in their lungs the rest of their lives." When this was brought to the attention of the spray contractors, they said "yes," and "stalled," doing nothing until the spray regulations were introduced.

Myriad substances in the environment constitute health hazards at some levels. However, control has served us well in the past and the principle should continue to be observed. The Air Pollution Code itself recognizes that the trivial amount of asbestos released into the air by brake linings does not constitute a danger. In medical practice, for example, it has long been recognized that five grains of digitalis can kill, but 0.5 grains can save lives.

One councilman asked if there is any area in the country where there is no asbestos in the air. Selikoff replied that his laboratory had been getting samples from everywhere; so far they had invariably found a few fibers in every sample. Selikoff estimates that "99.99%" of asbestos in city air comes from a few specific sources: factory wastes, the transport of materials. Air supply plenums in buildings recirculate air, and any friable material in such buildings become part of the air supply.

Q. What has happened to asbestos levels in New York City over the past ten years?

A. We have no way of knowing, since no measurements were taken ten years ago. We hope that future measurements will show a reduction over today.

Q. Is there a level of asbestos exposure known to have no effect?

A. We have no absolute knowledge of "no effect" levels. However, autopsies show that fibrils are present in every city dweller's lungs with no apparent ill effects.

Q. What about the combination of asbestos and cigarette smoking?

A. The combination is particularly bad among insulation workers, as my study shows.

Q. How effective have the control regulations on sprayed insulation been?

A. That is a very good question. The workers are still at risk, but not the citizens in the neighborhood. The regulations need to be rigorous and should require the wearing of respirators. Spray workers are exposed to higher levels than insulation workers.

Q. The code only proposes banning sprayed asbestos, not other products. If substitute substances that are equally effective but less hazardous are available, wouldn't the ban on asbestos be justified?

A. There are no studies on these new materials. There are none, and in 20 years we may learn that these are worse than asbestos. I repeat, the rigorous control, no matter how expensive, of all sprayed materials is the answer to the problem. Every occupational hazard that I know of, mercury, radiation, is subject to control. Now you propose to change that policy.

Q. When you refer to "asbestos workers" you do not mean those who work in factories?

A. My own studies have been concerned only with insulation workers.

Q. Is the asbestos industry doing research on health problems?

A. Yes. At least Johns-Manville is.

Q. What about the development of protective devices?

A. This has been productive of excellent results, particularly in Britain. The British are way ahead of the United States in controlling asbestos dust.

Q. Are adequate protective devices for the safe use of sprayed asbestos available today?

A. Yes.

Selikoff did not stay to hear the man who followed him on the stand, Assistant Commission of Air Resources Harold Romer. Romer took the position that the construction industry will not cooperate and that it is "virtually impossible" to control sprayed insulation adequately. Hence it is better to ban asbestos and take a chance that substitute materials will be less hazardous.

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