

From
W. N. JOHNSON

December 12, 1972

Mr. F. H. Larrison/
Mr. E. A. Piersall

DEC 14 1972
SAC - CALIFORNIA
ALBANY, CA

For your information.

Bill.

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AIA/NA MEMBER COMPANIES

E. C. Bratt	- H. K. Porter
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CC:

A. E. Alpine	- Certain-teed Products Corporation
G. M. Armstrong	- American Asbestos Textile Corporation
James Armstrong	- <u>Bendix Corporation</u>
A. A. Cross	- Cape Asbestos Company, Ltd.
Hugh Dawson-Walker	- <u>Hill & Knowlton (UK) Limited</u>
J. Hall	- GAF Corporation
S. Holmes	- <u>Turner Brothers Asbestos</u>
Wilfred Howard	- Asbestos Information Committee (England)

Asbestos Information Association/North America

22 East 40th Street
New York, N. Y. 10016
212-689-3378

November 27, 1972

Gentlemen:

On Wednesday, November 8, I traveled to Washington with a group of asbestos filter manufacturers to meet with members of the Food and Drug Administration's recently established task force on asbestos. The FDA representatives at the meeting included Dr. R. Schaffner, Director of the Office of Product Technology; Dr. Armand Cassola; Dr. A. D

3. Despite this admitted lack of experience and knowledge, they said that their basic goal was to identify and ban any and all asbestos-containing products that come in direct contact with foods, drugs or beverages during any stage of the processing procedure and could thus release fibers into the finished product. This would include not only asbestos filters but also such products as gaskets used in pressure cookers in the soup industry, etc. This last item is their example, not mine.
4. In response to a direct question from me, Dr. Berneking stated that the FDA considers any exposure to asbestos to be hazardous, no matter what the level; and that the FDA feels no obligation to produce evidence or even a logical

While it appears likely that asbestos-containing filters and filter media will not be banned by the FDA (some sort of control practices standard will be promulgated requiring the use of after-filters), the disturbing thing about the FDA's attitude toward asbestos is their stated intention to ban asbestos-containing products whether or not the medical evidence indicates that a ban is necessary. In fact, the FDA people admitted to us that they had intended to propose a complete ban of asbestos filters within a few weeks had not the industry stepped in with information on after-filters, background levels, etc.

The general philosophy of the FDA seems to be: we don't know enough about the health effects of asbestos to intelligently decide whether a use is safe or not, therefore we will ban all asbestos-containing products unless the industry can prove to us that the ban is unnecessary. This "guilty until proven innocent" philosophy will, quite obviously, prove very difficult for the industry to contend with in its dealings with the FDA in the future.

Asbestos-Cellulose Filter Material

Asbestos fibers have been in use as filter media since at least 1887 - 85 years ago. First asbestos-cellulose pads since 1917 - used in brewing, wines, etc., extensively in Europe.

First manufacture of asbestos-cellulose filter pads in the United States was 1931-32 again for potable products. Uses spread over the years to include not only wines and whiskeys, but also foods, beverages, chemicals, lotions, tonics, oils, pharmaceuticals, soaps, etc.

In July 1937, experimental use of asbestos-cellulose pads for

of shreds and particles in the filtrate. While the injection of solutions containing these particles into numerous experimental animals caused no detectable symptoms, their presence was none the less objectionable. After 16 months of evaluation, the difficulty was overcome by the use of an aloxite fiber eliminator between the asbestos-cellulose filter and the collecting chamber. Among some of the rejected after-filters, were Jena, Chamberland and Berkefeld filters.

The ability of asbestos-cellulose pads to remove pyrogens as well as other less critical contaminant is due to adsorption or adhesion and not to sieving. The uniqueness of this type of filter media is a result of the electrophoretic characteristics of the media. This is all due to the positive charge of the chrysotile fibers which are blended in with the cellulose fibers to form a firm filtration bed with depth and strength.

The grade and quality of asbestos fiber used in filtration is

asbestos filter media considers the vegetable oil industry probably their single greatest outlet - one customer alone producing one million pounds of edible fats and oils per day. Another industry is the production of wines - consider the fact that two manufacturers of asbestos-cellulose pads and loose media located plants in California, primarily serving the wine industry.

To sum up these comments, our filter media serves a definite need to not only the economy, but to mankind. Consider the fact that penicillin would not have been as readily available during World War II. Also, millions of filter pads were used by the armed forces for drinking water with one small filter unit per platoon. Water from ditches being typhoid free after filtration with asbestos-cellulose pads.

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New York, N. Y. 10016
212-689-3378

WHA

*Again:
D. Myers
Larrison
Piersall
"your info"
my work*

December 6, 1972

no authority to develop and revise health standards for coal mines. This authority is vested solely in the Department of Health, Education and Welfare, specifically in the National Institute of Occupational Safety and Health (NIOSH). The law states that: "The Secretary of Health, Education and Welfare shall ... develop and revise, as may be appropriate, improved mandatory health standards for the protection of life and the prevention of occupational diseases of (coal) miners.... Mandatory health standards which the Secretary of Health, Education and Welfare develops or revises shall be transmitted to the Secretary (of the Interior), and shall thereupon be published in the Federal Register by the Secretary (of the Interior) as proposed mandatory health standards."

The law further states that any comments received by the Department of the Interior with regard to a proposed coal mine health standard will not be reviewed by Interior, but shall

With the above facts in mind, it is easy to see the progression of events leading to the recommended two fiber standard in coal mines.

1. HEW (NIOSH) has sole authority to set health standards for coal mines.
2. The NIOSH position, as set forth in the Criteria Package, is that two fibers is the only safe limit for exposure to asbestos.
3. NIOSH was asked by the United Mine Workers to investigate the use of asbestos in the repair of strip mine shovels.
4. The results of their investigation showed that feasibility was not a problem with regard to a two fiber standard.
5. NIOSH, consequently, proposed a two fiber standard for coal mine operations.

"The Time Weighted Average airborne concentration of asbestos dust to which employees are exposed shall not exceed five fibers per milliliter greater than five microns in length as determined by the membrane filter method at 400-450 X magnification (four millimeter objective) phase contrast illumination. Concentrations above five fibers per milliliter, but not to exceed ten fibers per milliliter, may be permitted up to a total of 15 minutes in an hour for up to five hours in an eight hour day."

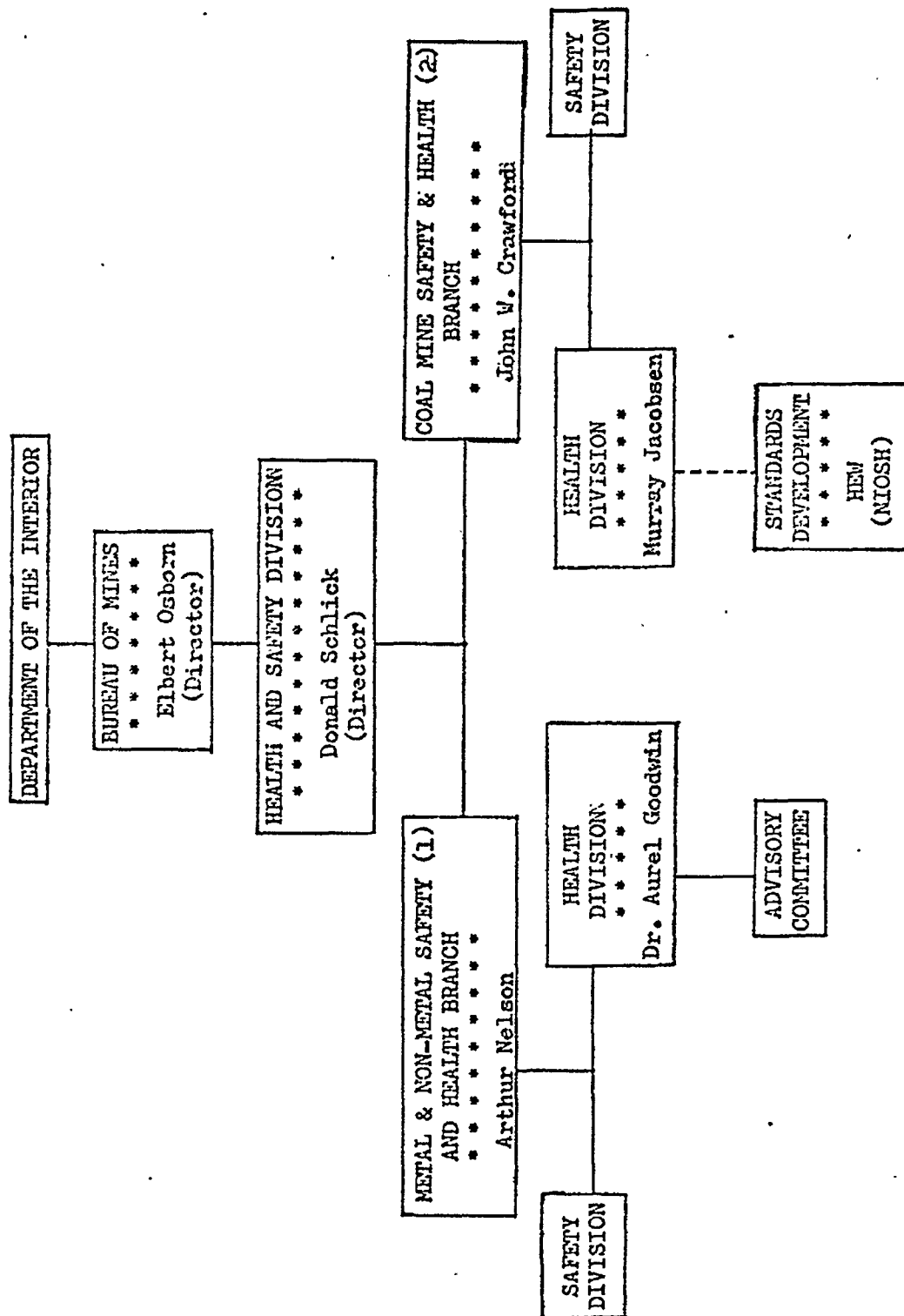
You may recognize the above as being the same exact wording contained in the OSHA emergency standard of December 7, 1971. The new proposed standard was developed by Dr. Goodwin sometime last spring, was approved by his Advisory Committee in July, and has spent the last five months climbing the Bureau's ladder of red tape (the asbestos

4. The Cement, Lime and Gypsum Workers Union has been pressuring Dr. Goodwin to develop an entire set of regulations on asbestos similar to the OSHA regulations. Strangely enough, they have not shown interest in the two vs. five fibers controversy. Dr. Goodwin said that such a set of standards is completely out of the question. He considers them unnecessary as well as impractical.
5. When the proposed standard is published, all interested parties will have 45 days to submit comments. Dr. Goodwin asked that the industry submit as much data as possible on (1) the safety of the five fiber level, and (2) the technical infeasibility of two fibers. He warned us that if he receives comments only in opposition to five fibers, he will be forced to lower the standard, but that if the comments are divided, he will be able to justify his original proposal.
- 6.

not directly affected by United States regulations, things of this nature have an unpleasant habit of creeping across national borders (as example, witness the effect of the British two fiber standard on United States governmental thinking).

Those in a position to submit medical data on the proposed standard should begin now to compile their information and plan their mode of attack. Consideration should also be given to the possibility of the smoking ban and whether it is advisable to include such a recommendation in our submissions. The ceiling concentration section of the proposed standard should also be looked at to determine whether it is more or less acceptable to the industry than the more simple ceiling standard adopted by OSHA.

While Dr. Goodwin is opposed to a public hearing on the standard, we should nevertheless not exclude the possibility that Dr. Selikoff



Coal Mines

10/21/71

ASBESTOS DUST HAZARDS ARE SUBJECT
OF JOINT NIOSH-MINE WORKERS RESEARCH

The elimination of dust hazards in strip mining is the goal of work being conducted jointly by the United Mine Workers of America and the National Institute for Occupational Safety and Health.

"Two UMWA districts have investigated

(CONTINUED FROM PREVIOUS PAGE)

A type of ventilation recommended by the American Conference of Governmental Industrial Hygienists should be used for each welder when possible, NIOSH said. "The exhausted air from such a set up should be released outside of the enclosure and in such a manner as to prevent the fumes from re-entering the workplace. In cases where the recommended set-up is extremely difficult or impossible some effort should be made to remove the fumes from the breathing zone of the worker and to prevent a buildup of a cloud of fumes inside the enclosure."

Kerr's Response

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