PLAINTIFF'S
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OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION
PUBLIC HEARINGS ON PROPOSED REGULATIONS
CONCERNING ASBESTOS DUST
WASHINGTON, D. C. - MARCH 16, 1972
STATEMENT OF JOSEPH G. HALL

B. JOHNSON
DEC 14 1979
EXHIBIT DJM-11

My name is Joseph G. Hall. I am Group Vice President of GAF Corporation's Building and Industrial Products Group. I have been associated with GAF for 22 years and have been involved with asbestos products and their manufacture for all of these years.

GAF appreciates the opportunity to participate in your public hearings on the Proposed Asbestos Regulations. We want to cooperate in this important area and to assist in the writing of practical Standards which protect the health of employees.

I would like first to give you a brief outline of GAF activities and policies.

GAF Corporation is a worldwide company which manufactures and distributes a wide range of products in five related consumer and industrial market areas. The areas are: chemicals, building materials, photographic film and equipment, office systems, and industrial products. The common bond uniting the product groups is chemical research and technology, from which GAF's "congeneric" nature evolved. Headquartered in New York City, we employ approximately 22,000 persons.

At its more than 70 manufacturing and processing plants throughout the U. S., GAF's policy is to operate in a safe manner consistent with sound business principles, and in compliance with all Federal, state and local laws. Our prime objective has been and continues to be as stated in our Company's Management Policy, "To provide a safe and healthful working environment for GAF employees that will minimize the occurrence of accidents and injuries to them."

Overall, GAF spent about $5 million last year and will expend in the neighborhood of $6 million this year on environmental control equipment. I cite these figures only to illustrate that my company is totally committed to its role of a responsible and concerned citizen.

The ever-changing and sometimes conflicting regulations of the many agencies operating in the health, safety and environmental control fields necessitate our having a fulltime staff of professional safety and environmental engineers to update and modernize our equipment and facilities to meet standards. This effort also includes research in those areas where there is presently no technology to combat certain problems. Our Corporate Health & Safety Department is responsible for formulating, developing and coordinating a complete Health & Safety Program.

The GAF Building, Flooring and Industrial Products Divisions utilize asbestos in the manufacture of a number of products. These products consist of the following: (1) asbestos cement products, consisting of siding, flat sheets, canal bulkheading and simulated brick facing; (2) asbestos felt and millboard; (3) asphalt paints and plastics; (4) vinyl asbestos floor tile and sheet flooring; and (5) asbestos fiber.

We employ 4,000 employees at 15 asbestos product plants and an asbestos mine. Our customers include many thousands of distributors, contractors and retailers. The proposed regulations may seriously affect their operations, as well as those of GAF. In addition, the above plants are supplied by several hundred vendors from whom we make purchases amounting to over $30,000,000 yearly.

Since we will be submitting, for the record, a detailed written statement, I will highlight our position as to the Proposals.

GAF has, in past years, spent several million dollars on asbestos dust control and believes it will be able to comply with a five (5) fiber S[illegible]ard, with the expenditure of an estimated additional $2.2 million dollars. However, this standard cannot be fully met for at least two years due to the time

necessary to design, order and receive abatement equipment. If a further material reduction below 5 fibers is later called for, the progress would have, of necessity, to be considerably slower. We believe that a standard substantially below five (5) fibers cannot be generally achieved in this decade and that if such a reduction could be accomplished, the cost would make questionable the economic feasibility of continued operations of certain of our facilities.

Exposure to and effects of asbestos have been studied for years by a number of eminent physicians. It has been concluded that the former 12 fiber limit and the two (2) million particles per cubic foot standard were not adequate. They have not agreed, however, that it is necessary to go below the five (5) fiber Standard. We request that further medical study be carried out so that a concensus can be reached as to the proper limit. At that time, if a new limit is required, it could be set with a realistic time schedule for achievement.

In addition, I am extremely concerned with the possibility that a label will be required to be placed upon asbestos-containing products. I strongly urge that this be reviewed in light of the "locked in" nature of the asbestos in many products and the deleterious effect a warning label would create with regard to distribution of these products in the marketplace. GAF does not oppose labels when they serve a

legitimate purpose as shown by our longstanding practice of labelling bags of asbestos fiber, but I see no reasonable purpose to be achieved by a label on products in which the asbestos is thoroughly bonded. A warning label, in our opinion, would seriously affect the future marketing of a number of our products. Vinyl floor tile, for instance, is often sold directly to the consumer and contains approximately 17% asbestos which is securely "locked in". There is no evidence of hazard related to the application or use of vinyl flooring and other "locked in" products, nor in our judgment is there any potential hazard due to the nature of those products. A label on flooring in particular would be highly misleading to the public, could be ruinous to over one-half billion dollar resilient flooring industry, and might well mean the loss of many jobs and possible plant closings. Where there is no need, there should be no warning label.

It is important for you to have an understanding of the size and importance of the asbestos industry. Asbestos serves hundreds of essential uses and has brought safety from the hazards of fire to all of us. Asbestos constitutes a multi-billion dollar industry and provides the livelihood for many thousands of workers. It is a strong, durable, flexible and fire resistant material. It is unique in the sense that no other material duplicates all of its useful qualities.

On the other hand, we do not question the potential adverse effect on health of this material when one is exposed for many years to significant concentrations of free fibers. In this regard, raw asbestos fiber should be controlled as well as any hazardous emissions from asbestos-containing products.

In conclusion, GAF does not oppose reasonable standards which are responsive to the problems and based upon all the facts. Our statement, which we are submitting for the record, has been assembled within a very brief time period since the emergency standard was enacted in December and subsidiary recommendations were published as recently as 2-1/2 weeks ago, when the Advisory Committee issued its Recommendations. Much more time is needed for study by GAF and, in our opinion, by the Labor Department. GAF Corporation pledges its cooperation to the Department of Labor and requests that all the facts be considered before a permanent standard is enacted, and that each future standard, when enacted, will regulate only the problem areas and not needlessly penalize workers and industry through enactment of superfluous controls.

Thank you.

We will be forwarding for the record a detailed statement within a few days.