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EPA RE Asbestos Proposed Mining and Import Restrictions



**United Union  
of Roofers,  
Waterproofers  
and  
Allied Workers**

Affiliated with AFL-CIO  
And Building and  
Construction Trades  
Department

1125 17th Street, N.W.  
Washington, D.C. 20036  
202/638-3228



Office of the  
International President  
Earl J. Kruse

June 25, 1986

Document Control Officer  
Office of Toxic Substances  
Environmental Protection Agency  
Room E-209  
401 M Street, S.W.  
Washington, DC 20460

RE: Docket Control Number OPTS-62036  
Asbestos Proposed Mining and Import  
Restrictions and Proposed Manufacturing  
Importation and Processing Prohibitions

To The Document Control Officer:

The United Union of Roofers, Waterproofers and Allied Workers which represents 30,000 commercial, industrial and residential roofers and waterproofers in the United States supports the proposed ban and phase-out of all asbestos use in the United States.

Our primary concern is with exposure during the installation and removal of asbestos roofing felts. But there are many other roofing products that still contain asbestos: fibrous mastics and emulsions used in roof maintenance; newer synthetic roofing membranes that have an asbestos fiber backing; and asbestos shingles used largely in residential roofing.

Industry claims that asbestos fibers are locked-in, or completely encapsulated in these products and therefore pose no health risk. Some even claim that because the fibers are locked-in and no exposure is possible, they are not required to label those products as containing asbestos according to the Hazard Communication Standard. So workers and contractors end up in the dark once again about the products they're using.

We believe these claims aren't justified based on existing exposure data. What little evidence there is concerning asbestos fiber release contradicts these industry assertions.

In the mid 1970s, Johns-Manville conducted a series of air sampling tests to measure asbestos exposures on built-up roofing installation and roof removal projects (report attached). Following the NIOSH monitoring and analytical method P and CAM 239, the Johns-Manville study found exposures to be as high as 0.4f/cc on roof projects involving the installation of asbestos roofing felts. On roof removal jobs, asbestos exposures were found to range as high as 1.7f/cc. According to OSHA's current standard for asbestos exposure (0.2f/cc) these exposures would be considered to present a significant health risk.

More recently, the National Roofing Contractors Association has sponsored a study of asbestos exposures in roofing. Two roofing sites were involved in this project. One test site involved the installation of asbestos roofing felts; the other was a roof removal project. They found no detectable levels of asbestos fibers using either the revised NIOSH 7400 method or the P and CAM 239 method. But there are major problems with their results.

To achieve acceptable precision using the NIOSH 7400 method, a minimum fiber loading of 100f/mm<sup>2</sup> of sampling filter area must be produced. None of the samples analyzed in this study appeared to meet this requirement.

Removing asbestos roofing shingles has also been found to release significant amounts of asbestos fibers. The National Institute for Occupational Safety and Health (NIOSH) conducted an evaluation of asbestos exposures during the removal of an asbestos roofing shingle operation (report attached). NIOSH concluded from this study that a health hazard existed and recommended a combination of work practices and respiratory protection to reduce worker exposure to airborne asbestos fibers.

There is other objective data which demonstrate significant asbestos fiber release during the performance of built-up roofing work. A study conducted by a student at Drexel University to fulfill requirements for a masters degree found significant airborne levels of asbestos fibers on two of three roof removal jobs tested. On one jobsite, personal exposures were found to be as high as 0.29f/cc (report attached).

It is clear that asbestos exposures occur in the process of installing and removing asbestos roofing felts, despite industry's claims to the contrary. The greatest potential

for asbestos exposures occurs during the removal of asbestos felts, when felts are scraped, cut and chiseled using powered machinery.

It is also clear that asbestos exposures can vary from one roofing job to the next, and can vary greatly and unpredictably over a single work day. Even if the 8 hour TWA is low for some jobs, there could be moments of brief, intense exposures. There is evidence that these intermittent, peak exposures - which may predominate in our industry - can be dangerous and lead to asbestos related disease. OSHA has pointed out that it is possible that intense exposures to asbestos may prove to be a variable independently related to asbestos-induced disease.

It appears from existing data that asbestos exposure levels are within boundaries that can be controlled using practical and economical methods like wetting the roof before and during the removal process and supplementing this work practice with respiratory protection.

While feasible solutions may exist, they are seldom if ever used. Respirators are not routinely provided on either installation or removal jobs. When provided, they are not used properly. Workers are not trained in how to use them. Workers are not fit-tested and are not shown how to perform negative and positive pressure leak tests on the job. No medical examinations are offered to respirator wearers to determine their ability to wear negative-pressure respirators. And no roofing contractor to our knowledge has developed a written respirator program.

We find that in many cases, roofers purchase their own respirators when they have been unable to get their contractors to provide them. When they do, it is usually a dust mask. Although there are dust masks approved for low level asbestos exposure, NIOSH does not recommend their use because asbestos is such a potent carcinogen.

Wetting the roof membrane before and during the removal process may significantly reduce exposures. But this work practice is also not routinely done. There may be situations where this practice is precluded.

Even with OSHA's newly promulgated asbestos standard, there is no guarantee that contractors will follow the stricter requirements. The reason is simple: roofing jobs are virtually exempt from OSHA health inspections. You would be hard pressed to find more than a handful of health inspections in the roofing industry in the past five years. Inspections for asbestos exposures are almost non-existent.

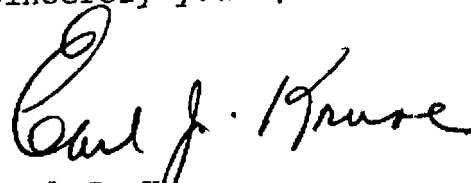
Given OSHA's meager enforcement effort in the roofing industry and the lack of any effective controls being implemented on roofing jobs, substitution is the only feasible way to eliminate the risk of asbestos-related diseases among our members.

We believe that safe and effective substitutes for asbestos products used in our industry do exist. EPA's analysis of the availability of substitutes aptly shows that suitable alternatives exist for asbestos roofing felts. The roofing industry has been moving away from asbestos roofing felts and other asbestos-containing products. As EPA indicates, less than 10% of the roofing felts sold today contain asbestos.

We believe that all the evidence regarding asbestos strongly points to a ban on asbestos products as the only sure way of reducing the risk to workers and to society of asbestos-related disease. OSHA points out that even at the lowest feasible occupational limit (0.1f/cc) a significant risk of cancer still exists. And it is the considered opinion of many experts that there is no safe level of asbestos exposure. They conclude that any occupational exposure above the ambient air level represents some increased risk to the worker.

We believe that imposing a ban on asbestos roofing felts and other asbestos roofing products would pose little or no economic burden on our industry. More than that, such a ban will undoubtedly save lives.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Earl J. Kruse". The signature is fluid and cursive, with a large initial "E" and "K".

Earl J. Kruse  
International President

EJK/csi

attachments