



ASBESTOS INFORMATION ASSOCIATION

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31 July 1979

Mr. John P. DeKany
Deputy Assistant Administrator
for Chemical Control
Environmental Protection Agency
Office of Toxic Substances
Washington, D.C. 20460

Dear Mr. DeKany:

Pursuant to this Association's request of April 9 for information concerning your office's ongoing investigation of asbestos, a copy of a report entitled "Exposure to Asbestos" as prepared by the IIT Research Institute was made available to AIA/NA by your letter of May 4. At a follow-on meeting on May 30 in EPA headquarters between EPA and AIA/NA representatives the report was discussed, and written comments were invited to be forwarded.

The Asbestos Information Association/North America is an incorporated, non-profit organization of 54 firms in the United States and Canada engaged in the mining/milling or sale of asbestos fiber and in the manufacture or processing of asbestos-containing products. AIA/NA is aware of the comments on the IITRI report that were submitted to EPA on June 15 by one of its member companies, the Johns-Manville Corporation. This Association strongly endorses J-M's comments and shares the same concerns regarding any credence that may be given the report as a part of EPA's investigation of asbestos. A copy of J-M's comments are enclosed for your ready reference and convenience.

In addition, this Association has developed some general comments on the report as well as specific comments regarding alleged asbestos exposure from brake linings. These comments are attached and invited to your attention.

At the meeting on May 30, a senior EPA official stated that the IIT Research Institute only had six weeks to prepare the study and referred to it as a "crude" report. A careful review of the report causes this Association to conclude that it is indeed a crude report and should be considered as having failed to meet its stated objective, i.e. "The purpose of the report is to gather the available information on asbestos sources and estimate the extent of the overall exposure to the general population."

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In view of the above, this Association requests that:

a. The IITRI report not be used as a reference document in support of any rulemaking process undertaken by EPA.

b. EPA clearly annotate the cover of the IITRI report with appropriate wording which directs specific attention to its shortcomings and deficiencies. The statement on page 1 of the report that "the present Exposure Index ranking is necessarily imprecise" could be overlooked in addition to being an understatement of the report's lacking in quality.

c. No distribution of the IITRI report be made without attachment of J'M's and AIA/NA comments thereto.

Please know that this Association appreciates the opportunity to review and comment on the IITRI report.

Sincerely,



B. J. Pigg
Executive Director

Enclosures

bjp/ws

CAPCO JEN 0011125

Comments on IITRI Report to EPA Entitled
"Exposure to Asbestos"

Asbestos Information Association/North America

General

While the report states, "The present exposure index ranking is necessarily imprecise," precise conclusions are attempted.

The report states, "Besides the technical and economical difficulty of measuring asbestos concentrations, two other facts of the hazard are not clear."

- (1) "The attributes of asbestos that actually cause disease and which therefore can give reliable measures of exposure, and"
- (2) "the concentration and time period of exposure to asbestos that is hazardous."

Despite this statement, definite conclusions are reached.

The report states, "Exposure to asbestos in the work environment was estimated by assuming that in the primary industries, average exposure was 1.0 fibers per cc, 2.0 f/cc in secondary industries and 0.1 f/cc in the consumer industries." No criteria is presented for determining these classifications or how an industry is rated as either a primary industry or a secondary industry.

The statement is made, "These estimates suggest that the population exposure in the area surrounding manufacturing plants from waste disposal may be comparable to the population exposure to the occupational population." There is no data that would support the conclusion that people living around an asbestos waste disposal site are exposed to the same fiber concentrations as those persons who work within the manufacturing operation where the asbestos waste was generated.

Brake Linings

The statement is made, "Most of the exposure assessment effort for commercial use has been devoted to activities of high exposure levels such as installation and removal of insulation and vehicular brake lining servicing and replacement." Data accumulated regarding brake lining servicing and repair does indicate that there are certain operations which are capable of producing excessive fiber concentrations if not performed properly. However, there is no preponderance of evidence which

indicates the entire operation produces "high exposure levels". In Table 7 on page 29, the brake service and repair operations are shown to have a concentration of 0.8 fibers per cc. If this is in fact the case, the statement that brake lining service and repair is a "high exposure risk" would tend to be refuted.

In the report there is a lengthy discussion regarding total brake emissions in New York City. The authors of the paper should refer to the EPA report prepared by Jacko et al which gives a definitive description of brake degradation products and their fate.