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J-M INTERNAL RECOMMENDATION AND/OR AUTHORIZATION

Page:

Subject: NEED FOR RESPIRATORS
E. E. WANG'S LETTER OF 2-18-86

Date: 2-25-86

PLAINTIFF'S EXHIBIT JMMC-67
PENGAD-Bayonne,N.J.

Explanation:

I very much disagree with the requirement that "all plant workers exposed to the asbestos environment (in our case, everyone), regardless of the current airborne asbestos concentration are required to wear their suitable respirators".

First and foremost, the recommendation made by the California Air Resources Board was questioned by AIA/NA (copy attached) as well as the State of California. It is my understanding that when this proposal was reviewed by higher officials in California they also questioned some of the data and the Board was instructed to review procedures and "facts" and answer some questions prior to continued review of the proposal.

I personally disagree with this assessment and requirement. It appears to be in line with the normal over-reaction of people who have not been well trained in the history and studies of asbestos fibre. One must first note that asbestos is a natural element and in some areas exposure naturally exceeds our plant exposure levels, with no increase in asbestos-related disease.

If this is a Corporate decision, how do we enforce the rule? Denison has been to court several times to stop smoking on plant property, and as you know, we were only able to restrict the smoking areas. Respirators are at best a very objectionable item to our employees. I feel that this rule would be challenged and without any factual reason to require respirators, we would lose.

If we are going on the assumption that a threshhold exposure level must be established before any exposure can be allowed, we need to put everyone into a totally clean atmosphere. I do not know of a single item that has a truly known safe threshhold exposure level.

If J-M A/C Corporation truly feels that this is a necessary requirement, they should not produce nor sell A/C pipe.

Prepared By: T. E. Lohman

Supervisor or Manager:	Department Manager: E. E. WANG To protect employees' health, it is highly recommended that they wear respirators. 2-28-86
Vice President: Joe Chen	President:

D 002156

FEB. 28 1986

J-M Manufacturing Co., Inc. — Internal Correspondence

To : All Plant Managers

Date: February 18, 1986

From : E. E. Wang, Stockton H.Q.

Copies : C. J. Chen, Wilfred Wang

Subject : ASBESTOS THRESHOLD EXPOSURE LEVEL

Asbestos is a known animal and human carcinogen. It has been listed by the U.S. Environmental Protection Agency as a hazardous air pollutant. The California Air Resources Board has recently recommended its listing as a toxic air contaminant. It should be further noted that there is not sufficient available scientific evidence to support the identification of an exposure level below which carcinogenic effects would not occur.

Since no threshold exposure level (below which no significant adverse health effects are expected to occur) can be established, plant workers exposed to the asbestos environment (regardless of the current airborne asbestos concentrations) are required to wear their suitable respirators all the time.

E. E. Wang

EEW:rac

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CALIFORNIA AIR RESOURCES BOARD STUDY OF ASBESTOS EMISSIONS DRAWS AIA/NA COMMENTS

AIA/NA responded on Oct. 18 to a California Air Resources Board (Board) staff investigation of asbestos emissions into the state's ambient air. The Board's determination could lead to the naming of asbestos as a toxic air contaminant (TAC). A TAC permits the Board and its local air pollution control districts to evaluate the need for, and appropriate degree of, controls for emission sources. Conclusions drawn in the staff report recommended the listing of asbestos as a TAC, and treatment of it as a substance without a carcinogenic threshold.

The thrust of AIA/NA's comments were directed at both the risk assessment and the exposure estimates presented. Highlighted are portions of the letter:

"Although the California staff has drafted its own assessment of potential risks at various exposure levels, it has reached conclusions that fall in the same range as prior risk assessment authored by the Consumer Product Safety Commission,

National Research Council and Ontario Royal Commission, as well as Dr. Nicholson who has performed risk assessments for both EPA and OSHA. In each of these assessments, the same issues of choice of epidemiology studies, conversion of historical measurements to today's monitored exposures, determination of the shape of the dose-response curve, and consideration of fiber types arise.

"A detailed assessment of these issues was contained in Dr. Kenny S. Crump's comments on the OSHA/Nicholson risk assessment. Dr. Crump is a recognized risk assessment expert who has often worked for EPA and OSHA. As Dr. Crump emphasizes in his report, each of the government risk assessments, and for similar reasons California's new assessment, must be understood to be "upper limit assessments" because they:

(1) Assume a linear dose-response relationship;

(2) Assume the same potency for all forms of asbestos despite significant data indicating lesser potency for chrysotile, particularly with respect to mesothelioma; and

(3) Include within the calculated risk the substantial portion of the lung cancer risk attributable to cigarette smoking."

"In addition, because the California risk assessment is intended to predict risks at much lower exposure levels (0.001 fibers/cc and lower vs. 0.1 fibers/cc and higher) than the OSHA risk assessment, even greater uncertainty exists that such upper level limit assessments are appropriate. In extrapolating risks to even lower levels than OSHA extrapolated, considerable likelihood exists that the linear dose-response relationship overestimates human risk."

"We also caution the Board against over-reliance on the exposure estimates set forth in the draft report. As the draft report acknowledges, no long-term asbestos sampling data are available and no method has been developed to extrapolate long-term average concentrations from limited short-term observations.

"Despite those limitations, it is significant to note that the Board's extensive monitoring program in fact found very little, if any, evidence that the identified emission sources contributed to ambient asbestos levels. The very low level of ambient asbestos found can be seen in two ways."

"Accordingly, it would appear that the sampling study confirms that little reason should exist for concern about potential asbestos emission sources in California. Even short term measurements in areas where asbestos emitters

might be expected to be most likely to be contributing to ambient exposures have not identified any significant contributions to asbestos levels."

The Board responded by letter of Nov. 6 to AIA/NA and acknowledged the limitations of their exposure estimates based on the monitoring of local sites. However, the intent, the Board asserts, was to document asbestos levels and the monitoring study accomplished this from their point of view. The Board referred AIA/NA's questions about risk assessment to the State Department of Health Services, which will issue a response at a later time.