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Ms. Madeline Nelson
c/o The San Francisco Bay Guardian
1070 Bryant Street
San Francisco, California 94102

Dear Ms. Nelson:

I appreciate your sending me a copy of the April 25th issue of the Bay Area Guardian which contains your article on asbestos. You are correct when you quote me as being opposed to the use of sprayed asbestos for fire-proofing, but I would like to clarify my reasons for this and add some information to put the matter of air contamination in perspective.

Four years ago, I did not think that asbestos should be banned until effective substitutes had been found. I believed then that the rigorous enforcement of measures to protect construction workers and to prevent dispersion of dust into surrounding streets would force the development and use of non-asbestos materials. In other words, that asbestos would be phased out. There has now been time to do this. ~~My reason for not~~ supporting a ban is not "that the asbestos level in the air all around the city is now similar to the level right around construction sites." It is because (1) I am against putting tons of asbestos into buildings that must some day be demolished and (2) the asbestos that is scattered about during actual construction contributes unnecessarily to contamination of our environment which receives asbestos from many sources. The amounts introduced into ventilation systems that circulate air through asbestos-coated spaces are small, but again they add unnecessarily to the amounts of asbestos we are all accumulating in our lungs.

My remarks on ambient air standards were misinterpreted. The point I intended to convey was that basing controls on the numbers of fibers collected in air samples near construction sites would probably not be effective and work practice standards would be preferable. The numbers would often be found to be lower than one would expect, and not too different upwind and downwind from construction sites. For example, we have measured airborne asbestos concentrations in downtown areas near buildings being sprayed and found from 9 to 77 fibers per liter upwind, 5 to 42 fibers per liter downwind. General ambient air in the Bay Area, not related to construction sites, ranged from less than 1 to 12 fibers per liter. My position on ambient air standards remains that of the National Academy of Sciences panel two years ago, that "Analytic methods and epidemiologic data are not yet adequate for the development of an ambient air standard but emission controls are needed and appear to be feasible." This is essentially the current approach of the Environmental Protection Agency.

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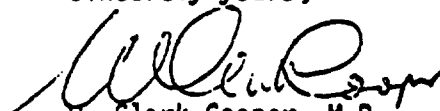
Our studies of the numbers of fibers in occupied buildings where asbestos had been used have shown the numbers to be low. In one such building, sprayed 4 years before our study with material similar to that in the Tishman building, air entering occupied areas contained from 0.2 to 2.7 fibers per liter, no higher than entry air from the outside. In another building sprayed one year before it was studied with a different material, there was evidence that fibers were being added during passage through the system, although no sample had more than 10 fibers per liter. It is important that people living and working in buildings where asbestos has been sprayed realize that the numbers are very small, at levels that have not been shown to be associated with a health risk. The proven effects of asbestos, such as lung cancer and mesothelial tumors, have largely been in workers who have had high exposures, commonly reaching many thousands of fibers per liter. We have found that the average exposures during the various jobs carried out by the insulating worker range from 2,600 to 8,900 fibers per liter, with individual counts over 60,000 fibers per liter. Household exposures can also be quite high, if dusty work clothes are carried home. There is thus a great difference between occupational exposures and the small numbers of fibers in our general environment. No one believes in inhaling any hazardous substance unnecessarily but it is important to keep dosages in perspective.

I have one other correction. My formal consulting relationship to the construction industry is with the Trustees of the Western States Asbestos Health Plan, representing both unions and contractors. We advise both labor and management and try to provide both with objective information on health hazards and their control.

I realize that the foregoing may sound like quibbling comments that are unimportant in the face of the main issue, that of enforcing present regulations and developing new ones if the present ones are inadequate. I don't want to weaken your main thrust of your argument, that this form of unnecessary exposure to asbestos should be eliminated. At the same time, I hate to see unwarranted anxiety and fear generated in the occupants of asbestos-sprayed buildings, whose exposures are so very low compared to those associated with occupational exposures. There are excellent reasons for believing that such low concentrations will not be associated with any detectable increase in illness.

Thanks again for sending me your article.

Sincerely yours,



W. Clark Cooper, M.D.

WCC:jmm

cc: Editor, San Francisco Bay Guardian

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