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ASBESTOS TEXTILE INSTITUTE

MINUTES -- GENERAL MEETING

June 8, 1972 - The Key Bridge MARRIOTT Hotel, Arlington,VA.

Attendance:

AMERICAN ASBESTOS TEXTILE CORP.
Wm. Maaskant
J.L. Rainey
H.H. Walter

GARLOCK INC.
S.G. DIXIT
Alex. Kuzmuk

JOHNS-MANVILLE CORPORATION
C.G. Guerin
M.S. Lindstrom
K.A. Roberts
J.P. Power (Canadian J/M Co.)

NICOLET INDUSTRIES
Geo. Griswold

H.K. PORTER COMPANY
E.C. Bratt
D.E. Childers
L.E. Moody

RAYBESTOS-MANHATTAN, INC.
J.W. Hawkins
R.T. Matthew
M.Q. Scowcroft
I.H. Weaver

UNIROYAL,INC.
D.T. Austin,Jr.
B.E. Carden
B.D. Bittinger
L.F. Dieringer
W.C. Hitchcock
E.A. Morris
S.J. Peele,Jr.

ASBESTOS CORPORATION LIMITED
P.E. Leclerc

BELL ASBESTOS MINES LIMITED
Walter H. Smith
Wm.J.W. Smith

LAKE ASBESTOS OF QUEBEC,LTD.
E.A. Farrell
C.E. Stiefken (ASARCO)

NIPPON ASBESTOS CO.,LTD.
Y. Sato

CADWALADER, WICKERSHAM & TAFT
Wendell B. Alcorn, Atty.

ASBESTOS TEXTILE INSTITUTE
H.E. Sunbury, Exec. Sec'y

Guest-of-Honor (Luncheon only)
Carl A. Gnam
Miscellaneous Metals & Min'ls Div.
U.S. Dept. of Commerce,Wash.,D.C.

Other attendees:

John H. Marsh (on June 7th only)
Raybestos-Manhattan,Inc.

***** Minutes *****

1. President Moody called the meeting to order at 2:00 P.M. Those in attendance were asked to stand and give their name and company.

2. The minutes of the last meeting were presented for reading. On motion of Mr. Scowcroft, seconded by Mr. Morris, it was voted to omit the reading of same.

3. Treasurer Kuzmuk presented the Financial Report. Mr. S.J.Peele,Jr. moved that it be accepted.Motion was seconded by L.F. Dieringer. So voted unanimously. The report is attached to these minutes.

4. Legal Counsel Wendell B. Alcorn reviewed developments under the Williams-Steiger Occupational Safety and Health Act that have occurred since our last meeting. The full text of his remarks is attached to these minutes.

5. Mr.Wm.J.W. Smith,V.P.-Sales, BELL ASBESTOS MINES LIMITED reported for the Fibre Producers. He commented that some of the very long grades of spinning fibers were still in short supply, but the medium and lower spinning grades were ample to meet current demand. In respect to other grades the No.4 and No.7 Group fibers are in good balance, in contrast to a slight oversupply of No.5 and No.6.

6. Announcements:- President Moody anounced the resignation of Mr.C.L. Sheckler as Chairman of the ATI Environmental Health Committee, and the appointment of Mr.L.F. Dieringer, Industrial Hygienist, Uniroyal,Inc., as the new chairman of that committee.

Also, the resignation of Mr.K.A. Roberts as Chairman of the ATI Air Hygiene & Mfg. Committee due to a change in his company duties. Mr. B.E. Carden, Uniroyal,Inc was appointed to succeed Mr. Roberts.

Mr. Moody reported that the Institute was represented at the Public Hearing held in Washington on March 14, 1972 on "Proposed Standards for Exposure to Asbestos Dust" by Mr. Alex.Kuzmuk, who is a member of the ATI Board of Governors and Treasurer of ATI. The full text of Mr. Kuzmuk's excellent presentation is attached..

7. Committee Reports:- The Chairmen of the committees listed below presented their reports. A copy of each is attached.

Air Hygiene & Mfg. Committee - K.A. Roberts, Chairman
Asbestos Advisory Committee - E.A. Morris, Chairman
Technical Committee - J.W. Hawkins, (Acting Chairman)
Fiber Testing Committee - C.E. Stiefken, Chairman

8. President Moody announced that the next A.T.I. General Meeting would be held on:

September 18 - 20, 1972 (Monday - Wednesday)

at the SEAVIEW COUNTRY CLUB

Absecon,N.J. (near Atlantic City,N.J.)

9. There being no further business to come before the meeting it was duly adjourned.

Respectfully submitted,

H.E. Sunbury

H.E. Sunbury, Sec'y

ASBESTOS TEXTILE INSTITUTE

Report of Funds — May 1, 1972

Balance On Hand at last report (Jan.10,1972)

General Fund	$ 160.84	
Reserve Fund	9040.68	
Petty Cash Fund	72.58	
Total On Hand as of Jan.10th, 1972		$9274.10

Receipts

To Reserve Fund (Interest to 3/31/72)	133.06	
To " " (1972 Dues)	2000.00	
To General Fund (1972 Dues)	7500.00	
To " " (Book Sales)	242.66	
		9875.72
Total On Hand and Received		$19149.82

Legal Services (6 mos.ending 3/31/72)	3437.00	
Legal Expenses (6 mos. " 3/31/72)	497.45	
Secretary's salary (4 mos.)	938.00	
F.I.C.A. Tax (3 mos.)	78.00	
N.J.U.A.D. Tax (3 mos.)	33.75	
Secretary's travel expense	135.00	
Office rent (4 mos.)	300.00	
A.T.I. meeting expense,Feb.2-3,1972	225.71	
A.T.I. Meeting expense,Oct.6-8,1971	23.66	
Printing & Office Supplies	40.44	
Stenographic	32.50	
Telephone (4 mos.)	150.40	
Travel Reimbursement (J.B.Gordon)	36.20	
Flowers, plaque,etc.	65.60	
Petty Cash (Vouchers 580-609 inclusive)	112.93	
		6106.64
Balance On Hand as of May 1st,1972		$13043.18

Funds as of May 1,1972

General Fund	$ 1815.67	
Reserve Fund (with interest to 3/31/72)	11173.74	
Petty Cash Fund	53.77	
Total Funds		$13043.18

Assets as of May 1, 1972

Total Funds as listed above	$13043.18	
Accounts Receivable (1972 Dues)	250.00	
" " (Book Sales)	25.35	
Postage On Hand	10.60	
Furniture & Equipment (Nominal Value)	1.00	
Total Assets		$13330.13

Liabilities — none

Net Worth — $13330.13

Respectfully submitted,

H.E. Sunbury

H.E. Sunbury
Asst. Treasurer

MINUTES

AIR HYGIENE & MFG. COMMITTEE

Asbestos Textile Institute

June 8, 1972 - Key Bridge Marriott Hotel, Arlington, VA.

In attendance:

Chm.K.A. Roberts	Johns-Manville Corp.
C.G. Guerin	" " "
J.P. Power	Canadian Johns-Manville Co.
J.L. Rainey	American Asbestos Textile Corp.
H.H. Walter	" " " "
S.G. Dixit	Garlock Inc.
E.C. Bratt	H.K. Porter Company,Inc.
L.E. Moody	" " " "
R.T. Matthew	Raybestos-Manhattan,Inc.
I.H. Weaver	" " "
E.A. Farrell	Lake Asbestos of Quebec,Ltd.
Y. Sato	Nippon Asbestos Co.,Ltd.
B.D. Bittinger	Uniroyal,Inc.
B.E. Carden	" "
L.F. Dieringer	" "
P.E. Leclerc	Asbestos Corporation Limited

* * * Minutes * * *

1. OSHA Standards for Asbestos:- Copies of the Federal Register for June 7, 1972 containing the new OSHA Standards for Asbestos were distributed to those in attendance in sufficient quantity to permit reading and discussing. The committee spent the major portion of its time on the Rules and Regulations for exposure to asbestos dust, Methods of Compliance; Monitoring; Warning Signs, Record Keeping; Medical Examinations and Medical Records; as set forth in the Standards.

There was general agreement that the asbestos textile industry, because of the nature of textile manufacturing operations, faced a real problem in trying to comply with the new regulation of 2 fibers per cubic centimeter(which are longer than 5 micrometers) of air, on a time-weighted average, effective July 1, 1976, without incurring excessive manufacturing costs.

2. Vacuum cleaning equipment:- A good discussion was had of various types. A favorable comment was made relative to Nilfish equipment.

3. Other items discussed:-

Dust collecting equipment
Wet processing technique in spinning and weaving
Protective clothing (under OSHA regulations)
Respirators (as specified by OSHA)

Respectfully submitted,

K.A. Roberts, Chairman

MEETING
June 8, 1972

Key Bridge Marriott Hotel
Washington (Arlington) D.C.

Mr. President:
Mr. Secretary:
Gentlemen:

The Asbestos Advisory Committee met this morning with all member companies in attendance.

Our discussion this morning centered on--as I am sure most of the other committee discussions did--the newly published Standard for Exposure to Asbestos Dust.

We touched on the various interpretations and the possible impact of the Standard, and I want to thank Wendell Alcorn for his succinct review of the Standard's content.

In addition, the proposed banning rule of the Food and Drug Administration was also discussed.

This rule, as presently constituted, would prohibit or ban the shipment of asbestos-containing consumer garments from interstate commerce, except those which were considered to be bona fide protection devices.

Although professing to be on the side of reason, the FDA claims to be under pressure to issue such a ruling which is predicated on the infamous "asbestos coat affair."

Advance copies of the second draft of the proposed banning rule will be mailed to the ATI for review. In the meantime, however, the Chairman of the Asbestos Advisory Committee, representing the ATI, will meet with the appropriate members of the FDA and attempt to present a truer picture of the issue at hand.

Since there was no further business to come before the committee, the meeting was adjourned at 10:45 A.M.

Respectfully submitted,

Edward A. Morris

Edward A. Morris
Chairman

TECHNICAL COMMITTEE

Asbestos Textile Institute - June 8, 1972 - Key Bridge Marriott, Wash.,D.C.

In Attendance:

J. W. Hawkins----------Raybestos-Manhattan, Inc.
William Maaskant--------American Asbestos Textile Corp.
D. T. Austin----------Uniroyal, Inc.

Mr. J. Hawkins acted as chairman due to the absence of Mr. Echerd.

MIL-C-10316B - Asbestos Cloth

Mr. Echerd has received a letter from Mr. Masson (Dept. of Army) stating that reference to ASTM D 1573, Heat Aging, has been deleted from MIL-C-10316B. ASTM D 1573 is being removed from the Book of Standards.

Mr. A. M. Blank, Dept. of Army, Belvoir, Va., has advised some customers that MIL-C-10316B is up for revision. ATI or member companies have not been advised. Mr. Echerd will ask for a time extention so textile industry can recommend changes prior to the issuance of the new specification.

MIL-C-82278 and MIL-C-82249 - Herringbone Cloth

Mr. Zemme of Natick has requested samples of 1.2 lb. herringbone cloth for their evaluation. These samples will have a rayon carrier fiber. If tests are satisfactory, rayon will be included in the new specifications. R/M will submit samples.

ASTM D 1118 - Magnetic Rating

Edited copies of D 1118 from ASTM and Dr. Scroggie were reviewed. The Technical Committee was in agreement and minor changes will be passed to Mr. Nicodemus by Mr. Maaskant. The section on sampling was rewritten to clarify the procedure. It was also requested that D 2590 remain as a reference in D 1118.

ASTM D 1918 - Asbestos Content

Edited copies of D 1918 from ASTM and Dr. Scroggie were reviewed. Mr. Maaskant will pass comments to Mr. Nicodemus.

Both D 1118 and D 1918 are presently complete and will be published in the next set of standards.

A procedure on resistivity of asbestos products was submitted, it will be discussed at the September meeting.

Respectfully submitted,

John W. Hawkins, Acting Chairman

Minutes

FIBER TESTING COMMITTEE

Asbestos Textile Institute
June 8, 1972 - The Key Bridge Marriott Hotel, Arlington, VA.

In attendance:

C.E. Stiefken, Chm. . . .	American Smelting & Refining Co. (Lake Asbestos of Quebec Limited)
D.E. Childers	H.K. Porter Company, Inc.
Walter H. Smith	Bell Asbestos Mines Limited

1. The meeting was devoted to a discussion of the testing procedures presently available for use in the forthcoming 3rd Edition of the "Chrysotile Asbestos Test Manual". (See footnote)

Letters have been sent to members at large, and to former chairmen of the ATI Fiber Testing Committee asking for comments and suggestions applicable to the new manual.

2. The Chairman will welcome all suggestions relative to the makeup of the new manual - preferences as to publishing, type of binding, etc. These should reach him well in advance of the next ATI meeting which is to be held on September 18-20, 1972.

3. There are thirty-three available test methods presently being considered for insertion in the new manual. Eighteen of these have been approved by both the QAMA and the ATI, leaving fifteen that have not been approved at this time.

4. We are now at the stage of having to wait for QAMA and ACPA to submit their final approval on the residual tests. When same is received the ATI Fiber Testing Committee will be ready to evaluate all test methods for final printing.

5. A tentative time-table for the test manual project, based on present indications, would be as follows:-

(a) June 30, 1972 - QAMA working deadline
(b) September 15, 1972 - QAMA tests delivered to ATI
(c) October 1972 - Joint meeting of QAMA, ACPA, and ATI to discuss format, printing, binding, etc. (Tentative - probably to be held in Montreal)
(d) February 1973 - Rough final draft of entire new manual
(e) March 1973 - All copy for manual to be delivered to the printer.

Assuming the above schedule can be met it is estimated, based on allowing 8 to 10 weeks for printing, that the new edition of the Chrysotile Asbestos Test Manual should be ready for distribution by June 1st, 1973.

Respectfully submitted,

C.E. Stiefken, Chairman (*)

Note: The first and second editions were titled -
"Testing Procedures for Chrysotile Asbestos Fibre".

(*) c/o American Smelting & Refining Co.
P.O.Box 127, So.Plainfield, N.J. 07080

Asbestos Textile Institute -- General Meeting -- June 7-8, 1972

INTRODUCTION

Last February in Charleston, South Carolina we talked at length about the Williams-Steiger Occupational Safety and Health Act (29 U.S.C. §655) which has now been effective for over a year. This is the Federal law which is administered by the Occupational Safety and Health Administration (OSHA).

Since the February meeting, there have occurred several developments with respect to OSHA which directly affect asbestos producers and users. These developments are the subject of my remarks today.

OSHA DEVELOPMENTS

On January 12, 1972, OSHA invited comments from interested persons on its proposed "Standard for Exposure to Asbestos Dust". Twelve days later, on January 24th, the Advisory Committee on Asbestos Dust was established to review this standard and make recommendations regarding it. The first meeting of the Committee was held February 3 (while we were in Charleston), at which Dr. Marcus M. Key presented the NIOSH "Criteria Document: Recommendations for an Occupational Exposure Standard for Asbestos". The final fruits of the Committee's work were

scheduled to be seen in the form of a permanent standard for asbestos dust exposure to be promulgated by June 7th. That was yesterday, and has been the main topic of many conversations at this meeting. Thus, the development of a permanent asbestos standard is now past history and attention must be turned to present and future compliance.

It can certainly be expected that enforcement of the new permanent asbestos standard will be as vigorous as the limitations of OSHA personnel and facilities will allow. Great pressure will be applied in favor of strict enforcement by labor unions, as surely as such groups have lobbied in the past for a low standard of exposure to asbestos dust.

In mid-March of this year, the Industrial Union Department of the AFL-CIO called exposure to asbestos dust "the most devastating environmental disaster yet perpetrated by any industrial nation" and announced that it planned to use as an example of the disastrous proportions of the asbestos health hazard the Johns-Manville Corporation plant in Manville, New Jersey. The reason the IUD focused on the Johns-Manville plant, according to a press statement, was "only because the facts are best documented in Manville and because these facts illustrate the need for stringent

control." (See Occupational Safety & Health Reporter, March 16, 1972, at page 967.)

In April, the month following the IUD announcement, there appeared a two-part article in the press directed at the alleged health hazards to which the workers in Manville have been exposed. The first part of the article bore the headline, "A Jersey Town is Dying -- Fast"; the second part opened with the heading, "A Man With 8 Months to Live". The article cited several cases of asbestos-related ailments and statements by Dr. Maxwell Borow and Dr. Irving Selikoff.

A short time later, an inspection was completed at the Manville, New Jersey plant by industrial hygienists of OSHA. On June 1, the report of that inspection, which resulted in the citation of five violations, was summarized in the press.

OSHA termed one of the violations at the Manville plant "serious" and the other four "minor". It said that the serious violation was found in the textiles building, where asbestos is made into yarn for weaving and carding. The four minor violations resulted from employees working without the required protective masks.

The investigation and citation of the alleged violations at the Manville plant should be considered typical of future OSHA activities in the enforcement of the asbestos

standard. Following an investigation and citation of violations, OSHA is required to send a notice of proposed penalties to the company, which then has 15 working days within which to notify the Secretary of Labor that it intends to contest either the citation of the violation or the proposed assessment of penalty. If the employer does not file such a notice, the citation and the assessment of penalty is deemed a final order of the OSHA Commission, and such a final order is not subject to review by any court or agency. It should also be noted that employees or their representatives may file a notice with the Secretary claiming that the period of time fixed for the abatement of the violation is unreasonable; in such case, a hearing is held by the Commission.

Where the employer appeals from a notice of violation or proposed assessment of penalty, he is entitled to a hearing and review by the Commission or hearing examiners. This hearing is a fact-finding proceeding in which the Secretary's citation or proposed penalty may be affirmed, modified or vacated. The Commission's order issued as a result of such hearing becomes final within thirty (30) days. However, if an employer can show that the abatement requirements of a Commission order have not been fulfilled because of factors beyond his control, the Secretary may, after a hearing, either affirm or modify the abatement requirements.

Where a notice of proposed penalty is uncontested or where an employer seeks no review of a final order of the Commission, automatic court enforcement is provided. If the employer fails to comply with this court order, he is subject to punishment for contempt.

However, a final order of the Commission may be reviewed, at the option of the person adversely affected or aggrieved by the order, and the review is by a United States circuit court of appeals. To obtain such review, a written petition must be filed in the court within sixty (60) days following the issuance of the order. This court review is governed by the rule of substantial evidence, that is, the findings of fact by the Commission are conclusive before the court if supported by substantial evidence. These court proceedings may result in an enforcement order, the non-compliance with which would subject the employer to contempt proceedings.

CONCLUSION

The promulgation of a permanent asbestos exposure standard has, of course, appeared inevitable for some time. The big issue over the past few months has been the level of exposure which would be written into the standard. That issue has now been settled, subject to revisions which may

occur in the future. Companies in the asbestos industry now face the task of meeting the new standard; and toward this end, OSHA can be expected to conduct inspections and issue citations wherever warranted.

The overall process of developing an asbestos exposure standard has involved the balancing of economics against health considerations. While it is still arguable that many of the medical studies submitted in favor of a very low exposure level are distorted and misleading, the balance between economics and health considerations has now been struck. The cost of implementing the standard will be high; and in recognition of the difficulty of putting into effect OSHA standards, the law provides that under certain specified conditions, an employer may obtain either a temporary or permanent variance from the standard. On the other hand, it may be expected that labor will vigorously oppose all applications for variances which cannot be justified in every respect. The variance rule should be invoked by employers only where a real need and justification can be found.

Wendell B. Alcorn, Atty.
Cadwalader, Wickersham & Taft

Presentation on Proposed Standard for Exposure to Asbestos Dust on behalf of the Asbestos Textile Institute and its member companies.

March 13, 1972

Mr. Arthur M. Goldberg
Hearing Examiner
U. S. Department of Labor
Office of the Under Secretary
Washington, D. C. 20210

Re: Hearing on Proposed Standard
For Exposure To Asbestos Dust
Beginning on March 14, 1972

Dear Mr. Goldberg:

My name is Alex Kuzmuk. I am a member of the Board of Governors of the Asbestos Textile Institute.

I am here today to officially represent and state the position of the Asbestos Textile Institute and its member companies. We are in opposition to the proposed asbestos dust standards as published in the FEDERAL REGISTER, January 12, 1972. We are also opposed to recommendations proposed in the NIOSH criteria package, and by the Asbestos Advisory Committee. /

The asbestos textile industry, which this association represents, includes over 4000 job opportunities in manufacturing, plus approximately 35,000 job opportunities in related product fabrication and sales. The gross business volume for manufacturing alone is over $80 million per year. The gross volume for related fabrication and sales is, therefore, many times this amount. Although this is not the largest segment of the asbestos industry, it is a very important one. Our product lines include the manu-

facture of safety garments, insulations, clutch facings, brake linings, paper dryer felts, mechanical packings and gaskets, laminated plastics, and many other commodities essential to today's technological progress. In many instances, there are no known substitutes for asbestos textile materials.

Subsequent to the enactment of the Occupational Safety and Health Act, the threshold limit value for asbestos dust was reduced from 5 million particles per cubic foot of air to 12 fibres per milliliter, 5 microns or greater in length. We, in the asbestos textile industry, made every possible effort to meet the 12 fibre threshold limit value by re-engineering dust hoods and dust collection equipment on cards, spinners, looms, and many other types of equipment. In addition, many of us initiated wet weaving and made extensive additional changes in processes and materials. When the further reduction to the threshold limit value for asbestos dust was published on December 7, 1971, we began all over again to study plans for revising equipment, processes, and materials, for which we had just spent thousands of dollars to install to meet the 12 fibre level. Many of us have not, and cannot, reduce our dust levels to the emergency and proposed 5 fibre threshold limit value.

If engineering to a 5 fibre level were feasible on the complex types of machinery and equipment used in the textile industry, the cost of implementation would make it extremely doubtful that this industry could survive economically. We are presently being pressed to the wall by our competitors. The cost of a

program to meet the proposed asbestos dust standards could be the determining factor for removing American-made asbestos textiles from the market place.

The competition to which I refer will not be required to make extensive capital investments to change processes, provide protective clothing, provide medical examinations, and monitoring. This competition is primarily from foreign imports. I, therefore, take this opportunity to ask this Federal agency whether it will take the responsibility of recommending equitable tariffs to prevent this economic disaster, if the proposed Asbestos Dust Standards become effective.

Beyond the proposed asbestos dust standards published in the January 12, 1972 FEDERAL REGISTER, there are recommendations by the National Institute of Occupational Safety and Health, and the Asbestos Advisory Committee. These recommend further reduction of the asbestos dust threshold limit value to 2 fibres per milliliter, plus many additional requirements concerning respirator equipment, protective clothing, monitoring, and others.

With the problems we are encountering in attempting to reach the present Emergency Asbestos Standard, it is unrealistic to even consider the feasibility of a 2 fibre standard. I would like to point out that Mr. Clifford L. Sheckler, Chairman of the Asbestos Textile Institute Environmental Health Committee, took the initiative in 1964 to request Dr. Lewis Cralley of the

United States Public Health Service to conduct an epidemiological study of our asbestos textile industry. We recognized then that a potential health problem existed and, therefore, we wanted expert advice and assistance to help us solve it. We have neither received the advice nor the assistance which we had hoped for.

We opened our plants to the United States Public Health Service personnel for environmental studies, review of our records, and physical examinations of our people. Our member companies urged employee participation in the study, and a substantial representative group of workers were involved. We continually requested the United States Public Health Service to increase their efforts and provide interim progress reports.

The Public Health Service Asbestos Study of which I speak has not been completed. A recent report, which is a primary factor in the recommendations by NIOSH and the Advisory Committee, was based on this incomplete study. The information provided in the report was based on opinion and speculation, rather than fact. Had the United States Public Health Service Asbestos Epidemiological Study been completed as continually requested by the Asbestos Textile Institute, we might now be in a position of having factual information as to what the safe threshold limit for asbestos dust really should be.

One factor is pertinent to this point. The asbestos related

disease involvement in the asbestos textile industry is being related to asbestos dust exposure levels as they presently exist rather than at the time the disease was incurred ~~25-30~~ years ago. Such a comparison is invalid. All of the past monitoring for asbestos dust in American textile plants has been done using the impinger method for sampling. Today's proposed standards are based on a fibre level using the Milapore filter method for sampling. There is no accurate correlation of impinger counts versus Milapore filter counts established to date. There has been some work done by the United States Public Health Service, but the results are incomplete. This is but one area that demonstrates the need for further health research studies and evaluations before unnecessarily creating an unrealistic standard that can be the demise of this industry and its related job opportunities.

We respectfully urge the Secretary of Labor to: (1) Reconsider the establishment of asbestos standards; (2) reinstate the threshold limit value for asbestos dust at 12 fibres per milliliter, 5 microns or greater in length for an interim period pending a comprehensive epidemiological study of the entire asbestos industry in the United States. I would like to point out that many comparisons have been made between the British and United States asbestos textile industry concerning health problems. The vast differences in materials, equipment and processes make such comparisons unrealistic. (3) Provide for representation of the Asbestos Textile Institute on future advisory and study

committees.

I would also like to point out that while many detailed requirements are included in the proposed standard, it is absolutely mute on the very important medically substantiated problem of cigarette smoking as associated with exposure to asbestos fibre.

We, of the Asbestos Textile Industry, have the greatest desire to prevent injury to our employees. We believe this can be accomplished without destroying the asbestos textile industry.

Thank you for the privilege of appearing at this hearing today.

Very truly yours,

A. Kuzmuk

Alex Kuzmuk
Treasurer and
Member of Board of Governors
for the
Asbestos Textile Institute

ak:jc