



# H. K. PORTER COMPANY, INC.

THERMOID DIVISION

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CHARLOTTE WORKS  
AREA CODE 704  
TEL. 372-2880

March 13, 1972



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

Dear Mr. Goldberg:

I am Ernest C. Bratt, General Manager-Asbestos of H. K. Porter Company, Inc. of Pittsburgh. In it's Thermoid Division, Porter operates two plants, one in Kentucky and one in Indiana engaged in manufacture of friction products including brake blocks and clutch facings. It also has a plant in North Carolina and one in South Carolina making Asbestos Textile products. In addition, a Porter subsidiary, Pacific Asbestos, mines the minerals in California. We are, therefore, vitally concerned with any standard proposed for the regulation of exposure to asbestos dust.

The Emergency Standard, promulgated on December 7th, 1971, reduced the exposure of employees from 12 fibers to 5 fibers greater than 5 microns per milliliter, a sizeable reduction. Because the ACGIH notice of intended change had indicated this level would probably be adopted, we have been dilligently working to reduce our dust counts to that level. We have in our two textile plants, complete recirculation of air, emitting nothing to atmosphere. Inside we have employed the best techniques available to hood our machines, exhaust and filter the air.

Nevertheless, compliance with a standard of 5 fibers in all areas has been difficult to obtain. A survey of the problems at our North Carolina

plant has indicated an additional expense of \$500,000 to try to reach 5 fibers. I say "try" because I know of no available engineering that can or will guarantee meeting the standard. The best we can do is spend the money and then test the results, and now we have a proposed standard of 2 fibers per milliliter recommended by the Advisory Committee on Asbestos Dust. What expense will be involved in meeting such a standard has not even been estimated by us. Porter's four plants may be facing an expenditure of \$2,000,000 to meet 5 fibers, to meet two fibers may not be economically feasible.

We believe the medical evidence to date does not warrant a standard of two fibers. In the interest of our employees health, we will support a 5 fiber standard, believing that any change below that should be the result of further study and more conclusive evidence.

To return to the economics for a moment, I would like to cite our recent past experience. In 1970, Porter operated two additional plants in its textile group, one in Missouri and a second in North Carolina. In light of the ACGIH notice of intended change we examined all our plants and determined that Davidson, North Carolina and St Louis, Mo. should be closed since neither had adequate controls and the cost of bringing them into compliance was judged to be excessive. It was not an easy decision since both plants were profitable and both had loyal work forces which would be displaced. Our South Carolina location was the newest, and the available money was allocated to that plant so that one expenditure could be made, not three. Over three quarters of a million dollars has been spent there in installing air and dust systems. Despite that expenditure, we are still faced with additional expenditures to meet 5 fibers. We have not even calculated 2.

Needless to say, the impact on earnings has been severe. Up to this point, we have been discussing capital expenditures and engineering services. There are a great many other requirements that will add to cost - day after day - year after year.

There is the requirements for vacuuming all waste. This will add \$70,000 minimum to the capital expense but the man power increase needed to operate the cleaners will add at least \$50,000 per year to our operating costs.

Other costs, such as respirators, medical examinations, record keeping, waste disposal, labeling, we have not estimated. We know it will be considerable.

Against these increased costs is the pressure of the market place where we can find our customers turning to alternative products except in those places where the unique properties of the asbestos make it irreplaceable. This is Porter's problem but the other side of the coin reflects in less jobs, lower income.

Our textile operations purchase over 5 million dollars of raw materials, our payrolls are in excess of \$1,500,000 and our local taxes over \$50,000. Our economic impact from those two plants alone is considerable.

I have addressed myself to the economic aspects of this standard leaving medical arguments to the experts. We want to and intend to remain in business. We hope the impact of this standard on the industry's economics will be given due consideration.

To summarize, my company is opposed to the standard as proposed in the following areas.

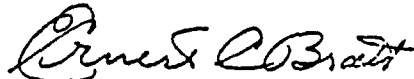
1. Allowable concentration: We believe 5 fibers to be a reasonable standard and that existing data does not warrant a reduction to two.

2. Personal Protection: We accept the respirator requirements but believe the proposed use of protective clothing at a level 10 times the limit is far too stringent and unnecessary.

3. Warning label and signs: Using the word "Danger" is unnecessarily alarming and not warranted. The words "Warning" or "Caution" would be preferable.

Sincerely yours,

H. K. PORTER COMPANY, INC.



Ernest C. Bratt  
General Manager-  
Asbestos Group

ECB/dcc