

FILTERING MATERIALS, INC.

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December 5, 1973

Hearing Clerk
Food and Drug Administration
Room 6-86
5600 Fishers Lane
Rockville, Maryland 20852

Subject: Proposed Rules - Asbestos in Food and Drug
Federal Register, Volume 38, Number 188,
September 28, 1973

Dear Sir:

We are producers of asbestos containing filter materials. As such, we are vitally interested in your subject proposed regulations.

On first reading, the regulations as proposed appear to be scientific and statesmanlike. On review, however, the failure to affirmatively endorse the well documented scientific evidence set forth in the bibliography and the failure to include by specific reference other materials of proven danger to the human body which are already being used as replacements for asbestos may prove fatal flaws. These flaws do damage to the apparent good intent of the Commissioner and potentially to the health of the American public as well.

It has been well documented in the Commissioner's analysis that there is no evidence that asbestos fibers ingested in the amounts which may migrate from filter media under normal commercial conditions have any deleterious effect to humans. Researchers (one) have also shown that asbestos bearing filters of appropriate construction are effective in reducing liquid borne asbestos fibrils which are ubiquitous in our water supplies. Notwithstanding this documentation, unscientific minds are still trying the problem by headline or by legislation such as that recently proposed in the State of Pennsylvania, House Bill 1559 dated October 30, 1973. We believe that it is the Commissioner's responsibility to protect the public from the harm of improper thinking just as he seeks to protect the public from the harm of improper manufacture. This can be accomplished by a straightforward rejection of the claim set forward by the Center for Science in the Public Interest that asbestos bearing filter materials for foods and beverages are harmful.

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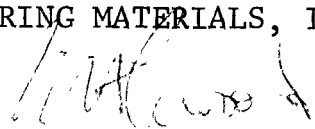
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Secondly, it has come to our attention that certain producers are marketing filtering materials where submicron diameter glass fibers have been substituted for the asbestos component. Some of these filters are claimed to have adsorptivity because of a charge on the glass fiber. Most chrysotile asbestos fibers are soft and flexible. This makes it difficult for them to pierce human membranes. In addition, the chrysotile fibers are subject to rapid erosion at the pH of the human stomach. Neither of these conditions applies for micro fiber glass. If this fiber glass were charged with the zeta potential resembling that of chrysotile asbestos, we can envisage major problems for humans ingesting or injected with such materials. Many researchers have pointed up the danger of micro fiber glass. If regulations are proposed for asbestos, we believe they should also include fiber glass and other fibers of similar nature. Unless the restrictions apply to these materials also, they will be substituted by default because asbestos has become the catch phrase while the more dangerous materials wait to be discovered.

Yours very truly,

FILTERING MATERIALS, INC.



R.W. Atwood

RWA:lw