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March 5, 1971

PUBLIC HEARING STATEMENT
CITY OF BOSTON AIR POLLUTION CONTROL COMMISSION
PROPOSED REGULATIONS NO. 5 AND NO. 6

Gentlemen, I am Clifford L. Sheckler. I represent the National Insulation Manufacturers Association and the Asbestos Cement Products Association. I serve as Chairman of the National Insulation Manufacturers Association Health and Safety Committee. Also, Chairman of the Asbestos Cement Products Association Health and Safety Council.

We respectfully call your attention to the City of Boston Air Pollution Control Commission Proposed Regulation No. 5 "Especially Hazardous Materials", and Regulation No. 6 "Miscellaneous Dusts and Dust-Producing Activities".

Both of the Associations that I represent, support the adoption of codes, rules and regulations designed to control exposures.

It is essential to protect workers that spray, and other construction employees, from exposure to potentially hazardous amounts of Asbestos or any other dusts, during the course of their work.

We also support efforts to reduce or control the emission of dust allowed to escape into the community atmosphere.

We strongly oppose, however, the complete banning of any useful or essential material, including asbestos-containing products, on the unproven allegation that its use may constitute a health hazard to the general public.

We are compelled to voice misgivings concerning Regulation 5.1 in that it is the beginning of establishing an extremely dangerous precedent. This Regulation would ban a material primarily essential to man's safety and well-being. Many materials possess some of the properties of asbestos - none combine them all. It is this unique combination of properties that makes asbestos indispensable to so many applications.

There is evidence that where adequate control measures were instituted the spraying of asbestos insulation could be controlled to the degree that only the normal, trivial amounts of asbestos were found in the ambient air.

Radiation is a hazard but we do not ban x-rays - instead we control the hazard.

Automobiles emit carbon monoxide but we do not ban automobiles - instead we attempt to control the emissions.

The opinion that asbestos can and should be controlled instead of banned is shared by many of our leading medical scientists.

I respectfully call the Committee's attention to comments by Dr. Lewis Cralley, U. S. Department of Health, Education, and Welfare; Public Health Service, presented at the XVI International Congress on Occupational Health, Tokyo, September 1969; "Asbestos can be used safely in modern technology if adequate precautions are taken to prevent excessive and unsuspected exposures".

In the October, 1969, Volume 100, Number 4, of the Official Journal of the American Thoracic Society, there is a paper entitled "Asbestos and Health in 1969" by Dr. George W. Wright. Dr. Wright said:

"The relationship between asbestos and health of humans, as reviewable in 1969, indicates that serious exposures to asbestos fiber can occur in certain occupational and immediately adjacent environments. Fortunately, the concentration of asbestos fibers in these settings can be controlled. The environment of the insulation workers is more difficult to control than the more fixed and permanent environment of the factory and associated neighborhood. An approximation of the concentration of respirable-sized asbestos fiber that can be tolerated without the risk of pulmonary fibrosis has been achieved. There is reason to believe that this concentration will

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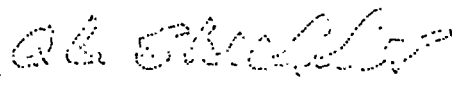
also minimize the risk of pulmonary malignancy including mesothelioma. Because of the long time lapse associated with the development of malignancy, longer periods of observation are desirable for a final decision on this point. There is reason to believe that the occupational use of asbestos fiber can achieve the same degree of safety as the use of explosives, radiation, and beryllium, although extensive alterations may be required in the control of production and manufacturing, the containment of asbestos fiber so that none escapes to the outside, and the proper disposal of solid wastes containing the fiber.

The risk to the general public posed by the mostly intermittent exposure to the low concentrations of asbestos likely to be present in the ambient air has been exaggerated beyond the limits imposed by known facts. Research to develop the necessary additional information upon which appropriate and realistic measures for safe use of asbestos fiber can be taken should be the goal in the next few years."

On February 26, 1971, Dr. Irving Selikoff appeared before the New York City Council Committee on Environmental Protection. Dr. Selikoff told the Committee that he objects to the ban on asbestos sprayed insulation and voiced misgivings about the

precedent such a ban might establish. He indicated this type of action could lead to the banning of other materials and I quote; "one substance after another could be banned". Dr. Selikoff was asked the question by a member of the Committee, "Are adequate protective devices for the safe use of sprayed asbestos available today?". Dr. Selikoff answered flatly, "Yes". Dr. Irving Selikoff again reiterated these opinions before the Chicago City Council Committee on Environmental Control on March 3, 1971.

The National Insulation Manufacturers Association and the Asbestos Cement Products Association urge this Committee to revise Regulation 5 and 6. Delete any reference to banning of asbestos or any other material. Establish necessary control measures to prevent excessive exposures.


Clifford L. Sheckler, Chairman

National Insulation Manufacturers Association
Health and Safety Committee

Asbestos Cement Products Association
Health and Safety Council